

Research and Economic Development – Internal Procedure

PROPOSAL REVIEW

I. PURPOSE AND BACKGROUND

The purpose of this procedure is to provide general guidance to Contract and Grant Officers in performing institutional reviews of extramural proposals.

UCR's Office of Research and Economic Development (RED) is the campus office with delegated authority to solicit, accept, and execute extramural awards.

In accordance with campus and system wide policies and procedures, the Sponsored Programs Administration (SPA) unit of RED, among other things, is responsible for reviewing and endorsing extramural proposals on behalf of The Regents.

Proposals are vetted at various organizational levels during the campus' proposal review and approval process. SPA's primary role in the process is to: (i) review proposals for compliance at the institutional level (e.g., examine the F&A rate used in the budget, the allowability of proposed costs, and the inclusion of institutional commitments and internal approvals, to confirm that necessary protocols are captured on eCAF, etc.) and (ii) endorse and submit proposals to sponsors prior to the submission deadline.

Two-Day Rule. SPA will conduct a proposal review once the eCAF and final proposal have been received two (2) full business days prior to the sponsor's stated deadline. For example, if the proposal is due by 5pm PST on Wednesday, the eCAF and proposal will need to arrive in SPA by 5pm PST on the prior Monday.

Late Proposals. In the event the eCAF and final proposal are received in SPA less than two (2) full business days from the sponsor's deadline, or after the sponsor's deadline has passed (i.e., after-the-fact), the CGO will remind the PI/CGA of the Two-Day Rule and the need for the PI to submit a justification, through the CGO, requesting exceptional approval from Sr. RED Management and addressing the reason why the proposal package could not be timely routed to SPA. If the justification is received, the CGO will email the justification to Associate Vice Chancellor for Research (AVC) or the AVC's designee, to seek an exceptional approval to proceed. The CGO may only proceed once this approval is received.

II. IMPLEMENTATION

This proposal review procedure is effective as of the revised date noted below and will be reviewed annually or more frequently as necessary. Modifications or changes to this procedure require the approval of the AVC or the AVC's designee.

III. DEFINITIONS

A. Contract and Grant Analyst (CGA) – a contract and grant analyst within a department or school, who handles pre-award administration at the department level (e.g., creates and/or reviews proposal budgets, forwards eCAF to the PI for review, certification & approval, etc.).

B. Contract and Grant Officer (CGO) – a contract and grant officer within SPA, regardless of Research Administrator level, who handles pre-award and non-financial post-award administration at the institution level and has the delegated authority to endorse and submits proposals on behalf of The Regents of the University of California.

C. The electronic Campus Approval Form (eCAF) - is an internal web-based electronic campus approval form that must be submitted with each proposal and routed through to RED, but which is not submitted to an outside agency. The eCAF is designed to enable efficient information dissemination and reliable on-line routing and approvals at all required organizational levels. This form also documents certain mandatory PI certifications and assurances.

D. Facilities and Administrative costs, a.k.a. ‘overhead’ or ‘indirect costs’, (F & A) - are those costs associated with the general operation of an institution in the conduct of its research activities but which do not relate solely to a particular sponsored project, program, or activity (e.g., the recovery of costs such as building use, administrative support, libraries, and operation and maintenance of a plant). Official F&A rates are negotiated and approved with UCR’s cognizant federal audit agency.

E. iPortal – RED’s information system for querying and entering data into the Research Administration data warehouse which is accessible from the [RED Intranet](#).

F. Principal Investigator (PI) - The UCR employee with primary responsibility for overseeing the scientific, technical, and administrative conduct of a funded research project. In most cases, this employee will be an individual with an academic appointment.

G. REMS – The University of California, Office of the President (UCOP) password protected database used to request sponsor codes and request indirect cost waivers/exceptions, and which is located at <https://rems.ucop.edu/rems/login.jsp>.

H. Scope of Work or Statement of Work (SOW) – The scientific or technical section of the proposal that outlines the research goals, methods, and/or research plan.

IV. PROPOSAL REVIEW

A. General Internal Guidelines for Proposal Review and Providing Institutional Endorsement/Signature

The following general internal guidelines should be followed by CGOs when conducting proposal reviews and/or providing institutional endorsements of proposals. These guidelines are not intended to address every situation that may arise. Thus, CGOs are expected to remain flexible, within reason, to facilitate the submission of proposals and to add value to the proposal submission process.

1. Proposal reviews must be conducted in a facilitative manner and should focus on institutional issues.
2. CGOs are always expected to use reason when analyzing issues to determine the level of risk to the institution. The institution could be put at risk in the following scenarios:
 - a. Cost share proposed in the proposal is not captured in eCAF along with the required cost share approval letters.
 - b. The research being proposed involves human subjects, animals, biohazardous materials or stem cells and the Research Integrity Committee Approvals have not been marked 'yes' on the eCAF.
 - c. Committing another individual/entity (e.g., subrecipient) to perform a component of the research, but the necessary approvals (e.g., letter of commitment, budget/budget justification, SOW, etc.) have not been obtained from such individual/entity.

The scenarios provided above is not an exhaustive list.

3. CGOs must document within the eCAF or iPortal, as necessary and appropriate, the institutional issues and concerns that they identify, as well as their resolution.
4. Correspondences concerning the proposal review should be directed to the PI and CGA.
5. If the risk associated with an institutional issue is low and it is reasonable to address and resolve the issue after proposal submission, endorse and submit the proposal; thereafter, address and resolve the issue. The issue must be resolved prior to accepting any award resulting from the proposal (e.g., obtaining any issuing letter of support from a collaborator; obtaining any missing quotes from a vendor or consultant, etc.).

6. At a minimum, before starting a proposal review, the following documents should be received by the appropriate CGO:

a. An eCAF that has been routed through to RED. (Note: RED will accept an email, fax, photocopies, PDFs, or other reasonable means of conveying a signature/approval on a case-by-case basis.)

b. Sponsor's solicitation or guidelines. (Note: A sponsor's proposal preparation instructions is not a solicitation or guideline and should not be accepted as such.)

c. A complete and final version of the proposal uploaded to eCAF, Cayuse or the Sponsor's submission site. If the sponsor requires the submission of a hardcopy (paper) proposal, the original application face page and/or other documents that require an institutional signature (e.g., certifications and assurances) shall be provided to the CGO for signature.

7. Proposals should be reviewed in the order received by the CGO to which he/she has been assigned.

8. CGO shall determine if any of the parties to the proposal (e.g., prime sponsor, sponsor, subrecipients and/or collaborators) are **foreign**. If so, perform a Restricted Party Screening (RPS) using Visual Compliance for each identified foreign party. (Refer to Standard Operating Procedure Restricted Party Screening, End-Use & End-User Checks for further information on the RPS process <https://exportcontrol.ucr.edu/documents-and-procedures>).

9. CGO shall determine if any export control Red Flags (as defined below) are present. If one or more 'Red Flags' are present, contact the Export Control Office for assistance. (Refer to Standard Operating Procedure Agreements, Contracts & Grants for further information on identifying and escalating Red Flags <https://exportcontrol.ucr.edu/documents-and-procedures>).

Red Flags are defined by the Export Administration Regulations (EAR) as "any abnormal circumstances in a transaction that indicate that the export may be destined for an inappropriate end-use, end-user or destination," and may involve an elevated risk of non-compliance with the EAR, reputational or political risk, and added administrative costs for managing high-risk engagements.

10. CGO shall verify institutional information and identifiers in the proposal or application are accurate (e.g., Institutional name, EIN, Authorized Official, Compliance Numbers, etc.). This information is available on the SPA website at: <https://research.ucr.edu/spa/lifecycle/proposalpreparation/institutional-information>.

B. Sponsor Guidelines, Application Instructions, Program Announcements, Requests for Applications, etc.

Prior to beginning the eCAF review, CGOs should review the sponsor's guidelines (e.g., program announcement, requests of application, sponsor's application instructions, etc.) for the following:

1. Verify institutional eligibility.
2. Determine if UCR must submit certifications, assurances or representations. (Review the "Representations and Certifications" located at <https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/representations-certifications/index.html> for additional guidance).
3. Identify issues related to institutional commitments or concerns including, but not limited to:
 - a. Cost sharing requirement and or policy.
 - b. Special institutional or regulatory approvals (e.g., approved IRB/HRRB protocol at proposal submission; Intellectual Property Plan, etc.)
 - c. F&A rate limitations
 - d. Special commitments or requirements affecting the whole institution (e.g., limited number of submissions, Chancellor's signature required, ambiguous language with the potential to infringe upon faculty academic freedoms, etc.)
 - e. Construction and/or renovation (review and evaluation of costs need to be confirmed with Architects and Engineers (A&E) prior to submission).
4. Determine if the sponsor's policies are consistent with UC's and UCR's governing principles, policies and practices by reviewing proposed award terms and conditions (if available). Special areas of concern include, but are not limited to:
 - a. Patent rights
 - b. Copyrights
 - c. Ownership of records and data use rights
 - d. Publication restrictions (e.g., length of publication delay, sponsor approval and/or editorial rights)

e. Publication restrictions, foreign national restrictions, citizenship requirements, performance of work that is not considered 'basic research' or 'applied research' in science or engineering, performance of classified work, receipt of Controlled Unclassified Information (CUI) or Controlled Unclassified Technology (CTI), or any other issue that would threaten or remove the fundamental research 'safe harbor' exemption under U.S. export control laws.

f. Use and protection of confidential or proprietary information

Upon review of the sponsor's policies, determine if any noted concerns or issues need to be addressed with the sponsor at the time of proposal submission (e.g., identify the issues or reserve a right to negotiate via a proposal cover letter).

Determine if the proposal is subject to review by the State Clearinghouse under Presidential Executive Order 12372. This review requirement is usually listed on the application cover page or in the program announcement, otherwise the CGO can go to the following website: <http://cfda.opr.ca.gov>. In the event the CFDA number is not listed in the drop-down menu, no further action is needed. If it is listed, the CGO will need to fill out the online form, attach the signed SF424 and submit. Once submitted, an email confirmation will be provided to the CGO stating that a request has been sent to the State for review. The Clearinghouse will advise within 30 days whether or not the review requirement has been met. (For background information related to this review requirement, see [UC Contract and Grant Manual Chapter 2, Section 2-584, located at https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter2/chapter-2-500.html#ch2-584](https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter2/chapter-2-500.html#ch2-584)).

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C. eCAF

The CGO will receive an automated email when an eCAF arrives in their queue. The eCAF is accessible via the Proposal & Award Management Information System Portal (PAMIS) located at <https://pamis.ucr.edu>.

Review the eCAF for accuracy of information and determine whether the proposal has received all appropriate organizational approvals.

- CGOs should ensure the information in all fields of the eCAF are accurate before providing RED FINAL APPROVAL, as the eCAF cannot be edited after finalization and such information will establish the PAMIS Proposal and serve as the institutional record.

The following are guidelines for reviewing an eCAF, and is organized by the following eCAF tabs:



1. **Overview Tab**: This tab provides a broad summary of information from all tabs in the eCAF on one page.

2. **PI Information Tab**:

a. Verify that the PI, all Co-PI's, Co-Investigators and any other Senior/Key Personnel (including their respective Department or Center, as appropriate) are listed in the eCAF, consistent with those listed in the proposal. Note: In the event a Co-PI, Co-Investigator or Senior Key Personnel were left off of the eCAF, the CGO must notify the PreAward Manager (or another member of SPA Management having 'eCAF Superuser' authorization) to return the eCAF using the 'Re-Routing Required' function to enable the necessary missed organizational approvals to be obtained.

b. Subrecipients and consultants should be listed in this tab when included as part of the proposal.

i. The following documents are required at the proposal stage in order to confirm the subrecipient's proposed work and costs are appropriately documented and endorsed by an authorized official: **letter of institutional commitment, scope of work, detailed budget, and budget justification** (if required by sponsor). Such documentation must be uploaded in the Attachments Tab of the eCAF. NOTE: If a foreign subrecipient is proposed, CGOs should advise the subrecipient to register in SAM, if they have not yet done so, as the process may take up to six months.

ii. Consultant cost estimates should be secured in writing. This may be in the form of a written quote or in a letter from the principal investigator or department to the consultant confirming a verbal quote. Letters should also provide details required by the sponsor (e.g., daily rate, dates for work to be performed, etc.). Such documentation should be uploaded in the Attachments Tab of the eCAF.

3. **Project Information Tab**: In the Project Information tab, review/confirm the following:

a. **Project Title** header –

i. Verify the Project Title is labeled pursuant to the instructions in the solicitation, if any. For example, under some programs, the title **must** begin with “Collaborative Research:”, “CAREER:”, “DISSERTATION RESEARCH:”, “IGERT:”, “IOS Preliminary Proposal:” or some similar specified label).

ii. Compare the Project Title listed in the eCAF to the information contained in the proposal application, ensuring that they match prior to finalizing the eCAF.

b. **Dates** header -

i. Verify Sponsor due date indicated in the eCAF is consistent with the solicitation.

➤ If the due date is incorrect, update the sponsor deadline listed in the eCAF.

➤ If the due date appears to be after the sponsor due date, inquire with the CGA or PI whether: (a) approval has been secured from the sponsor to submit a late proposal; or (b) the proposal was already submitted (i.e., the proposal was originally submitted to the sponsor without SPA’s prior review and endorsement) and this eCAF represents an after-the-fact proposal.

ii. Sponsor Delivery Requirements – This is an open field that allows the Department to specify special proposal submission requirements, such as:

a) *Electronic Submission through Sponsor website*

b) *Specify if the proposal is due by a specific time/time zone.*

c) *Original signature required for a paper submission*

CGOs should review this section to determine how and when the proposal needs to be submitted to the sponsor and coordinate accordingly with the CGA and PI.

iii. Department Due Date/College Due Date/RED Due Date – These are pre-populated fields based on the sponsor’s due date that is entered by the CGA/PI.

c. **Sponsor Information** header –

i. Sponsor - Verify the sponsor code indicated is correct, and that sponsor code 009850 (the Miscellaneous Sponsor code) is NOT used. If there is no sponsor code assigned to

the sponsor, a request for a sponsor code must be submitted by the CGO via the REMS system and updated in the eCAF **prior** to finalizing the eCAF.

ii. Verify the sponsor indicated is the direct sponsor to UCR. If funds are being flowed down from a prime sponsor, CGOs should ensure that the prime sponsor is listed under the Proposal Information header below as the prime sponsor in the eCAF. NOTE: In order to list a sponsor and a prime sponsor, the PI/CGA must select “Subcontract” as the proposal nature. [For purposes of this eCAF system which was development prior to implementation of the Uniform Guidance, use of the term “Subcontract” should be now inferred to mean “Subrecipient.”]

iii. Solicitation – If the proposal is in response to a solicitation, verify the link provided is valid and, nonetheless, that a copy of the solicitation has been uploaded to the Attachments tab.

iv. Existing sponsor award # should be indicated in this section when the proposal is being submitted as a Renewal or a Supplement. CGOs should look-up the award # in iPortal to determine if the existing sponsor award # indicated is correct.

d. Proposal Information header –

i. Proposal Type – This field indicates whether the proposal is a request for New, Renewal, or Supplemental funding.

ii. Proposal Submission Type – This field indicates how the proposal should be submitted to the sponsor (e.g., electronic submission via sponsor’s system, e-mail to sponsor, paper via mail or express mail, or electronic and paper per sponsor requirement). Verify the submission method selected coincides with the required submission method listed in the solicitation, if any.

iii. Proposal Nature – This field indicates the instrument or mechanism which the sponsor will use to award the funds to the successful applicant (i.e. Grant, Contract, Cooperative Agreement, or Subaward). If Subaward is selected, the Prime Sponsor field will be required. Verify the funding mechanism selected coincides with the anticipated funding mechanism listed in the solicitation, if any. (Note: Definitions of each funding mechanism is available within the eCAF.)

iv. Type of Project – This field indicates the type of sponsored project (e.g. Applied Research, Basic Research, Developmental Research, Other Research, Training, Public Service, Other Service, Equipment, Scholarships/Fellowships or Other) and the applicable F&A rate that should be utilized when preparing the budget for such project type. Verify that the project type selected coincides with the effort described in the abstract or SOW. (Note: Definitions of each project type is available within the eCAF.)

v. Project Period – Determine if the dates indicated in the eCAF coincide with the proposal documents that will be submitted to the sponsor and, if applicable, adhere to the sponsor’s requirements.

vi. Initial Period – This field indicates the end date of the first budget period and enables the eCAF to establish whether the first year of the budget period is less than one year.

vii. Site of Majority of Work – Determine if the project will be performed on or off-campus (in whole or in part):

a) If On-Campus, verify the appropriate on-campus F&A rate for the project type has been utilized in the Budget Tab.

b) If Off-Campus, verify the appropriate off-campus F&A rate for the project type has been utilized in the Budget tab. Additionally, the CGO must obtain supporting documentation, from the PI/CGA, which demonstrates that the majority of the ‘salaried’ effort is conducted off-campus. If necessary, ask the PI/CGA to complete the On/Off Campus IDC rate Determination Sample spreadsheet (located on the RED Shared Drive as S:\Sponsored_Programs\TEMPLATES&Forms\Forms). Departments may provide their own spreadsheet so long as the salaried effort is properly captured. Per our federally negotiated F&A rate agreement, salary cost (excluding fringe benefits) is generally accepted as a measure of work performed in terms of the total project. Please refer to our federally negotiated F&A rate agreement for additional guidance as well as the UCOP C&G Manual, Chapter 8-320.2 - Determining an Off-Campus Rate.

c) If the work site is a non-UCR facility (i.e., not owned, rented or leased-space by UCR), an agreement (i.e., off-site research agreement) or subaward between UCR and the non-UCR site may be needed. If this is the case, notify the appropriate SPA Principal Contract and Grant Officer or SPA Management.

viii. Space Requirements. If the eCAF indicates additional space is required to conduct the project and alterations/renovations are needed, approval from Architects and Engineers is required. Additionally, this will require Dean’s Office approval, and confirmation from Department Financial and Administration Officer. Such approvals are also required for construction grants **prior** to proposal submission.

ix. Faculty Release Time - Review proposal documents to determine if faculty release time is needed (e.g., Scholar in-residence or the solicitation may require the professor to be on sabbatical or not receive funding from another sponsor).

a) Typically, faculty release time is requested when a PI receives a fellowship grant (e.g., resident scholar, off-site researcher, curator, writing a book, etc.) and

the University will be awarded funding to cover a portion of the PI's salary during his/her leave. In some cases, the sponsor allows the PI to receive his/her salary stipend through the University in order to keep his/her fringe benefits active and continue accruing years of service credits.

b) CGO should clarify if the sponsor requires the University to cover the PI's difference in salary and fringe.

c) Occasionally, PIs will indicate faculty release time is needed when they are requesting funds for a Course Buyout. *Course Buyouts are generally not considered a directly allocable cost to the sponsor/project (as the hired lecturer is paid to teach a course, not to work on the sponsored project).* Therefore, it is more appropriate to request the PI's estimated salary and fringe based on their effort on the sponsored project, and the department funds that would normally be used to pay for the PI's salary could be used towards the Course Buyout. *However, if the PI insists on including a Course Buyout in this budget; CGOs should obtain documentation from the sponsor that Course Buyouts will be approved as an allowable cost on the project.*

x. Facility Safety Plan – This field, typically completed by the PI, provides confirmation whether the sponsor's application guidelines/instructions or solicitation (e.g., funding opportunity announcement, request for proposals, request for bid, broad agency announcement, etc.) does or does not require the submission of a Facility Safety Plan and/or an assurance regarding UCR's Facility Safety Plan.

xi. Abstract/Narrative. This field, typically completed by the PI, provides a brief synopsis or technical description of the effort to be performed (if funded).

a) Pursuant to Section C (3)(d)(iv) above, this field is helpful to determine if the appropriate project type and F&A rate has been proposed.

4. **Budget Information Tab:**

a. **Facilities and Administrative (F&A) Costs** header –

i. Determine if the appropriate F&A rate was used as it relates to the scope of work being proposed (e.g., research, instruction, or other sponsored activity) and location (i.e., on-campus or off-campus) of the proposed work. Use the Request Alternative F&A Rate button to correct the Rate (%) and/or Base Description (e.g., MTDC, TDC, TC, etc.), as appropriate.

ii. If a rate other than UCR's approved F&A rate is used, it must be based upon one of two criteria, sponsor policy or campus determination. If the request is based upon sponsor policy, first determine if an approved exception (formally referred to as a

“waiver”) exists in the REMS database under the Verified Sponsor Policy (VSP) based on the solicitation and/or type of program that the PI is applying to.

iii. If an approved exception does not exist under the VSP list, then an indirect cost rate exception must be requested and submitted via REMS for review and/or approval to UCOP or RED, as appropriate. The supporting documentation for the limited indirect cost rate should be provided by the PI or the CGA. For additional guidance, please review UC Contract and Grant Manual, Chapter 8 – Indirect Costs, at: <http://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter8/index.html>.

NOTE: If an eCAF is submitted to RED with a proposed rate less than UCR’s federally negotiated F&A rate, an additional tab will appear to the right of the Budget Information tab labeled **F&A Exception Request**. This additional tab will allow the CGO to indicate if there is an existing VSP exception or whether a request for a new exception has been submitted in REMS for approval (see below).

b. Budget Information header –

i. Verify that the Total All Costs for both the initial and total periods are consistent with the budget information contained in the proposal. If the amounts differ, CGO should contact the PI/CGA to address any discrepancies and instruct PI/CGA to update eCAF and/or proposal documents, if necessary.

ii. Review budget documents, including the budget justification (if required by the sponsor), for any institutional compliance issues (e.g., allowability of items being requested as direct costs, but which are generally covered under F&A; whether costs are accurately and appropriately categorized; quotes for equipment requested in the budget are uploaded to the eCAF; requests for Participant Support is appropriate and follows the definition of what qualifies as Participant Support costs).

iii. Verify if any other budget documents are required by the sponsor (e.g., use of specific budget template/format; authorized official’s signature on budget, etc.).

5. **F&A Exception Request Tab**:

a. Verify that the appropriate Exception Type was selected by the PI/CGA (i.e., Existing Exception or New Exception) by checking the VSP list of exceptions in REMS.

If an active VSP exception exists, the Exception Number, Rate (%), and Base Description should coincide with the information in the corresponding fields within this tab of the eCAF.

If there is not an active VSP exception, the CGO must request a new exception in REMS. Below are the three different types of Requests for Exceptions to F&A cost recovery:

i. **Sponsor Policy:** Exception requests based on sponsor policy are valid only for the approved project at the campus of approval. Campus proposal ID is required at time of exception request. Awards with Multiple Campus Awards (MCAs) need separate exceptions at each MCA campus. Requests based upon a sponsor's policy for federal funding will be routed to UCOP for review and approval while for-profit and non-profit sponsors are routed to RED; all State of California requests are prepared under the Special Approval requests below. If UCR is the recipient campus, CGO should use the copy function in REMS to copy the prime recipient campus exception for its MCA.

ii. **Campus Determination:** Campus Determination exceptions apply to requests when there is no sponsor policy supporting the reduced indirect cost rate. The PI will be required to prepare a memo to the AVCR stating the need for the request and the rate being proposed. This request is routed in REMS to the AVCR for review and approval.

iii. **Special Approval:** A Special Approval exception request is submitted in REMS to UCOP for all State of California agreements in which the agency is requiring an indirect cost rate outside of the currently approved state rate. Special Approval requests shall be submitted to UCOP per REMS Sponsor Guidance record 306.

b. After submitting a new exception request via REMS, CGOs should complete the eCAF F&A Exception Request tab by entering the requested Rate (%), selecting the Base Description, and entering the provisional exception number and date requested in the Comments field.

6. **Cost Sharing Tab:**

a. Any portion of project or program costs not borne by the sponsor is a form of cost sharing. Cost sharing may be mandated by the sponsor (e.g., for an instrumentation grant, the sponsor may require UCR to contribute 25% of the acquisition costs), voluntarily committed (i.e., cost sharing offered in the absence of a sponsor's written requirement to cost share), or voluntarily uncommitted (e.g., effort to be performed by a co-PI yet not quantified in the proposal nor mandated by the sponsor). Please note that any cost sharing commitment quantified in a proposal becomes a legally binding commitment upon UCR if the proposal is awarded, thus necessitating that the cost sharing be tracked, documented, and reported to the sponsor. If cost sharing or matching funds are listed in the Cost Share Tab of the eCAF, verify the following:

i. The proposal quantifies a cost sharing commitment.

ii. The proposed cost share is an allowable cost per UC policies, sponsor guidelines, and 2 CFR Part 200 (aka 'Uniform Guidance').

iii. If cost sharing will be contributed by a department other than the lead department, each commitment should be acknowledged or approved in writing by the responsible official.

iv. If the Vice Chancellor for Research and Economic Development (VCR) is mentioned as providing cost sharing, this commitment must be approved in writing by the VCR. CGOs should confirm if supporting documents have been received and uploaded in the Attachments tab of the eCAF confirming this commitment. If there is no supporting documentation provided in the eCAF, CGO should notify the AVCR of the commitment and provide the eCAF# to him/her to facilitate coordinating the VCR's written approval.

b. Forms of Cost Sharing and Which to List in the eCAF

i. **Sponsor Mandated Cost Sharing.** Sponsor Mandated Cost Sharing are those project costs that are not borne by the sponsor but are required as a condition of the award. *Sponsor Mandated Cost Sharing must be documented in the eCAF.*

Note: "Sponsor-encouraged" cost sharing, not required as a condition of receiving an award, does not constitute sponsor mandated cost sharing.

ii. **Voluntary Committed Cost Sharing.** Voluntary Committed Cost Sharing are those project costs that are not borne by the sponsor and are not required as a condition of the award, but are identified and quantified in the proposal narrative, budget or budget justification (ordinarily in the form of contributed effort that exceeds the corresponding request for funding). *Voluntary Committed Cost Sharing must be documented in the eCAF.*

Voluntary committed cost sharing becomes mandatory once the award is made and must be added to the direct cost research base for indirect cost calculations.

Example: Dr. S's proposal contains the following statement:

"Dr. H will be providing 5% effort to serve as a co-investigator on this project."

The budget does not contain any salary for Dr. H. Is this cost sharing and, if so what type? Answer: Yes, even though the Funding Opportunity Announcement (FOA) for this grant does not require cost sharing, the 5% effort proposed by Dr. H is voluntary committed cost sharing.

iii. **Voluntary Uncommitted Cost Sharing (VUCS).** Voluntary Uncommitted Cost Sharing is that effort expended by university faculty and senior researchers over and above that which is committed and budgeted for in a sponsored award. VUCS does not include costs other than salary and fringe and is not considered to be cost sharing, either for reporting or indirect cost calculation purposes. *Voluntary Uncommitted Cost Sharing is not documented in the eCAF.*

Example: If the sponsor agency’s funding opportunity announcement (FOA) 1) expressly disallows PI salary and 2) there is no requirement for PI effort, then no PI effort is required and any effort expended by the PI on this project will be treated as voluntary uncommitted cost sharing. Note that both conditions above must apply. In this instance, PI effort should be expressed as “as needed” in the proposal.

c. Matching. UCR uses the term ‘Matching’ to define cost sharing (in cash) that is committed by a third party (i.e., not UCR and not the sponsor). *Ensure that the eCAF includes documentation confirming any third-party matching funds.*

Example: PI is proposing to use a Citrus Research Board Award as matching towards a California Department of Food and Agriculture proposal. In this scenario, the PI must provide a letter from the Citrus Research Board allowing the PI to utilize the award as a match to the CDFA proposal. The letter should include the project title, amount, and project period.

d. In-Kind Cost Sharing. In-Kind Cost Sharing are non-cash contributions of time, talent, or resources committed by a third party. Third-party in-kind contributions may be in the form of real property, equipment, supplies and other expendable property, or goods and services directly benefiting and specifically designated for the project or program. *Ensure that the eCAF includes documentation confirming any third-party in-kind cost sharing.*

7. **PI Research Integrity Tab**:

a. Research Integrity Committee Approvals header –

i. This section indicates whether the project will involve human subjects/tissues/stem cells, animals, biosafety issues, radioisotopes, or human pluripotent cells. If a CGO believes that the proposed work involves any of the foregoing, but the eCAF indicates otherwise, contact the PI for further clarification and/or correction. If the PI indicates that the eCAF is correct, but the CGO is still uncertain (e.g., SOW specifies that a questionnaire will be distributed to persons yet eCAF indicated human subjects review is not required), then contact the appropriate analyst in the Office of Research Integrity (ORI) to review.

ii. The CGO is also responsible for ensuring that the correct information appears on the proposal application where necessary.

b. Research Development header –

This section permits the PI to indicate whether he/she would like grant writing/editing assistance for the proposal. Research Development is notified via an email from PAMIS requesting assistance.

c. Intellectual Property (“IP”) header –

i. Review the proposal to ensure the University is not making any promises regarding IP that may conflict with University policy (please see <https://www.ucop.edu/research-policy-analysis-coordination/policies-guidance/intellectual-property-ex/index.html>).

ii. Determine if the sponsor requires (per the solicitation) the disclosure of background IP. If yes, CGOs should ensure background IP is clearly identified in the proposal.

iii. Any proprietary information involved with the proposed research must also be clearly identified in the proposal. This information is also helpful at the time of the award, especially when negotiating terms and conditions.

iv. If the sponsor is requesting an IP plan to be included in the proposal, CGO should coordinate between the PI and UCR’s Office of Technology Partnerships (OTP) to draft an IP plan.

d. Are Any of the Following Involved? header –

These are merely Yes/No questions.

i. Drug Abuse Research. If this question is marked yes, review the protocol to verify the research does not utilize illegal drugs.

ii. Investigational New Drugs. This question alerts the CGO that the proposal involves pre-clinical or clinical research and may have IP implications depending on who authored the protocol.

iii. Sustainability Research. This question enables the eCAF system to track proposals that involve sustainability research and, when requested of SPA Superusers, to generate a ‘Report on eCAFs with Sustainability’.

e. Export Controls header –

i. Review responses to the Export Control questions and escalate affirmative responses to the Export Control Office, as needed. (Refer to Standard Operating Procedure Agreements, Contracts & Grants for further information <https://exportcontrol.ucr.edu/documents-and-procedures>).

ii. As necessary, verify with PI that the work he/she will be conducting is Fundamental Research.

Fundamental Research is defined as basic and applied research in science and engineering conducted at an accredited U.S. institution of higher education where the resulting information is ordinarily published and shared broadly within the scientific community.

iii. For more information on Export Control, CGOs should review all available resources on the Export Control Office website (<https://exportcontrol.ucr.edu/>) and contact the Export Control Office with any questions.

f. Environmental Health and Safety header –

This allows the PI to indicate whether any toxic or carcinogenic chemical, lasers/x-rays/high power RF, other biological hazards will be used on this project.

g. Disclosure of Financial Interest header –

i. For non-governmental entities, verify if sponsor is listed under the exempt sponsor list (<http://www.ucop.edu/research-policy-analysis-coordination/policies-guidance/conflict-of-interest/list-of-non-governmental-entities-exempt-from-disclosure-requirement.html>). If sponsor is not exempt, the CGO is responsible for securing an original 700-U form from the PI and any Co-PIs.

Upon receipt of the 700-U, CGOs should review for completion/accuracy and write the proposal number on the 700-U form(s) and deliver the original form(s) to the appropriate ORI mail slot in the RED mailroom. Note: Completed 700-U forms are not required to be saved under the Attachments tab in the eCAF, however, it is recommended that CGOs add a comment in the eCAF indicating whether the original signed 700-U form was received and provided to ORI prior to finalizing the eCAF.

ii. For NSF, verify that the Federal Disclosure of Financial Interest section of the eCAF has been completed, and all questions fully answered, as the Disclosure Form for NSF Conflict of Interest Policy (Form 925) has now been fully incorporated within the eCAF and is no longer required to be uploaded as a separate attachment.

iii. For PHS and those agencies or organizations which follow PHS disclosure requirements (e.g., NIH, American Heart, American Cancer Society, etc.), a PHS Form 500 must be completed and signed by each PI listed in the eCAF and proposal. *PHS defines PI as: Principal Investigator, Co-Investigators, Senior and Key Personnel, and any other individual who is responsible for the design, conduct, or reporting of research funded by PHS or an agency or organization that follows PHS disclosure requirements.*

h. Principal Investigator Certifications and Assurances header –

i. Confirm that all the certifications have been checked/accepted by the PI, if not, the eCAF will need to be returned to the CGA to route to the PI to complete.

Comments Tab:

This tab lists any comments that may have been provided by the CGA, PIs/co-PI(s), Department Chair(s), and/or Dean(s). CGOs may enter comments in this tab; however, once a comment has been entered and saved, it may not be edited. Therefore, it is recommended that CGOs enter any necessary comments using the comment field under the RED Approval Tab which is editable.

8. **Approval Status Tab:**

The eCAF is designed to capture the appropriate and necessary approvals based on the activity code associated with the PI's and all Co-PIs' administrative unit(s) and the associated roles assigned in the Enterprise Access Control System (EACS).

- a. This tab is helpful to see all the approvals that have been obtained. A detailed transmittal log and a graphical representation of the eCAF routing are provided in this tab.
- b. If the PI is a Dean or Vice Chancellor, the eCAF requires the approval of the Executive Vice Chancellor or Chancellor, as appropriate. A PDF of the eCAF overview tab should be emailed to the assistant of the Executive Vice Chancellor or Chancellor to obtain the necessary review and signature. This signed overview tab document is then uploaded into the eCAF. (The CGO will coordinate this approval once the eCAF has been received.)

9. **Attachments Tab:**

The Attachments tab is used by CGAs and PIs to upload all proposal documents (e.g., budget, budget justification, SOW, etc.) that will be required for the full proposal submission and available for viewing by each signer during the routing for electronic signature phase. An eCAF user can upload attachments even if the eCAF is not in his/her queue.

- a. CGOs should use this tab to upload any necessary proposal documents required, such as, but not limited to, Institutional Letter of Commitment, signed Assurance Forms, Submitted Application and Submission Confirmation, and any correspondence regarding the Proposal review.
- b. Prior to providing RED Final Approval, check off the "Final" box located next to each document that was submitted to the sponsor as part of the proposal package, especially in the event there are multiple versions uploaded. CGOs should also delete any irrelevant documents, as appropriate.

10. **Co-PI Approval, Chair Approval, & Dean Approval Tab:**

These tabs provide the date and time stamp indicating when each individual has approved the eCAF, and any comments they may have provided.

11. **RED Approval Tab:**

As stated in Section 8 above, this tab is provided for the CGO to provide their review comments. CGO should communicate the institutional issues and concerns identified during the proposal review to the PI and CGA.

Before finalizing the eCAF, it is recommended that the CGO use this tab to indicate any low risk outstanding issues (e.g., awaiting an original signed 700 rather than a pdf copy, waiting approval of an IDC Exception, etc.).

Side Note: All comments from the Comments tab and REDApproval tab of the eCAF will automatically appear on the Notes tab of the Proposal in iPortal. In the event the Proposal is funded, the Notes tab will enable the CGO to address any outstanding issues (if any) prior to executing and processing the award.

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eCAF APPROVALS.

For PRE-PROPOSALS Only.

- Do NOT provide RED FINAL APPROVAL upon submission of a pre-proposal.
- Instead, when the pre-proposal is ready for submission to sponsor, the eCAF should only be provided PRELIMINARY APPROVAL, as this eCAF will be utilized in the event the sponsor invites the PI to submit a full proposal. As a precaution, the CGO should preface the project title in eCAF with “Pre-Proposal” or “LOI” as a reminder that this eCAF may be utilized for a full proposal submission.
 - If an invitation to submit a full proposal is extended from the sponsor, then the CGO shall remove “Pre-Proposal” or “LOI” from the Project Title and request that the eCAF be returned to the CGA by a SPA Superuser using the “Re-Routing Required” function. This function will require the eCAF to start the entire routing process over again after the full proposal documents and the various eCAF fields (e.g., sponsor deadline) have been updated, as applicable.
 - In the event an invitation to submit a full proposal is not extended, then the CGO at that point shall:
 - (i) Finalize the pre-proposal eCAF and click on ‘RED FINAL APPROVAL’ in the top right-hand corner of the eCAF.
 - (ii) Take note of the assigned PAMIS Proposal number that is auto-generated
 - (iii) Change the status of the Proposal from “Pending” to “Rejected” in iPortal.

For FULL PROPOSALS.

- To finalize the eCAF, click on the ‘PRELIMINARY APPROVAL’ link in the top right-hand corner of the eCAF, and then click on the ‘RED FINAL APPROVAL’ link in the top right-hand corner of the eCAF.