

Research & Economic Development – Internal Procedure

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

Authorization for PreAward Spending 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, animals, 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.
- **Sponsor’s Firm Commitment.** Confirmation of a firm commitment from the Sponsor’s authorized representative.
 -  Note: A PreAward Spending Request may proceed without the Sponsor's firm commitment if the Department Approver, or the Organizational Approver (as appropriate), has authorized the PreAward Spending Request despite the increased financial risk in doing so in the absence of the Sponsor's firm commitment.

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- **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 Chart of Account ("COA") in the event losses are incurred because of the PreAward Spending Request, then certification must be obtained by the appropriate Dean or Vice Chancellor whose office will provide the use of an alternate COA ("Organizational Approver")

Risks, Liabilities, and Limitations:

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

- **Risks.** Whenever the University approves a PreAward Spending Request, 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 Spending Request 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 (also available online) for additional background.

- **Exhibit A: UC Contract and Grant Manual, Chapter 6-300.** "Expenditure Advance Based on a Firm Commitment," retrieved 12/06/2023, last revised unknown. <https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter6/chapter-6-300.html>
- **Exhibit B: UCR Policy 550-80.** "PreAward Spending," retrieved 12/06/2023, last revised 1/12/16. <https://policyking.ucr.edu/home/policy/6539d1030ad0f868b8663690>
- **Exhibit C: UCR Sponsored Programs Administration webpage.** "PreAward Administration and PreAward Spending," retrieved 12/06/2023, last revised unknown. <https://research.ucr.edu/spa/lifecycle/preaward>
- **Exhibit D: Frequently Asked Questions**

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IMPLEMENTATION

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

IMPORTANT PROCEDURAL NOTES:

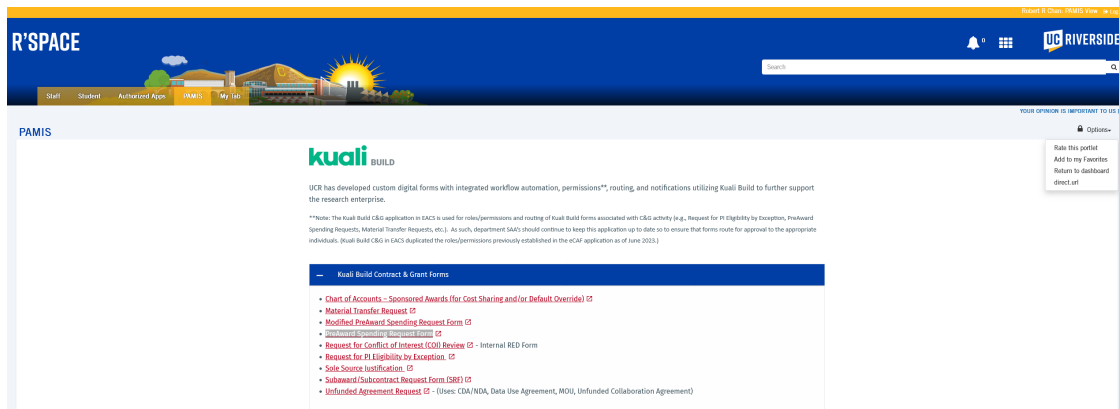
- **Use of UCR’s Quali Build PreAward Spending Request form is required:** PreAward spending requests are initiated through submission of a PreAward Spending Request form which is located under the Quali Build Contract & Grant Forms section on the PAMIS tab in R’Space (see <https://ucr.kualibuild.com/build/space/all-apps>). Once the form is initiated, approved by the PI, and subsequently approved by the Department Approver and/or Organizational Approver, the form auto-routes to RED for assignment to the applicable RED Officer.
- **Review PreAward Spending Request within 24-48 hours of receipt:**

Upon receipt of a PreAward Spending Request, the RED Officer should promptly verify that the request received is for a PI within the RED Officer’s complement of departments.

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

NOTE: The processing and approval of the PreAward Spending 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 Spending Request needs to be returned to the Departmental for correction(s) for which there may be a delay before it is returned to the RED Officer.



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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.

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.

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.

Form Submitter – The person who initiates the Kualii Build Form.

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

Institutional Proposal Number – The UCR proposal number assigned in Kualii once a proposal has been finalized (i.e., approved and submitted) in the Proposal Development module.

Kualii Research (aka Kualii) – Kualii’s cloud-based research applications (i.e., Proposal Development, Institutional Proposal, Award, Subaward, Compliance, and Export Control) used to standardize the routing and approval processes for research proposals, administration, and documentation across various departments.

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New Award – An award made by a Sponsor to fund a project where the Sponsor has not previously provided funding for the project. 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.

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 PI’s point of contact for inquiries relating to the research.

Promoting Research Objectivity (PRO) Committee – A committee within the Research Integrity department charged with reviewing Investigator statements of financial interest related to their sponsored research activities and determining whether a conflict-of-interest management plan is warranted after review of all the facts and circumstances.

RED Officer – Research & Economic Development Officer (includes SPA Contract and Grant Officers and Industry Contract Officers, regardless of level).

Renewal Award – An Award that modifies a previous award by 1) providing additional funding, 2) extending the project beyond the originally approved project period, **and** 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.)

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PREAWARD SPENDING REQUEST NOTIFICATION







RECEIPT OF A PREAWARD SPENDING REQUEST

When a PreAward Spending Request is routed to a RED Officer, an automated email notification will be sent to all RED Officers. The subject line of the email notification will advise that a Task requires a RED Officer to take action. The subject line also identifies the name of the PI and his/her primary or secondary department that will administer the PreAward, and subsequent Award once received. Depending on whose complement of departments the named department falls and the sponsor type, will determine which RED Officer is to handle the task.


Example of an automated email notification sent to RED Officers:


Task: PreAward Spending Request From Marissa D BrookesPolitical Science Dept

 no-reply@mail.kualibuild.com
To:  Timothy A Wolfe

11:43 AM



 If there are problems with how this message is displayed, click here to view it in a web browser.



Hello Timothy,

Review PreAward Spending Request.

Form Name: **PREAWARD SPENDING REQUEST**
Step Name: **RED APPROVER TASK**
Your Action: **COMPLETE TASK**
Instructions: **Please remember to add comments/attachments, if needed. When all tasks are completed, select the "Mark Complete" button to enable approval and forward routing.**

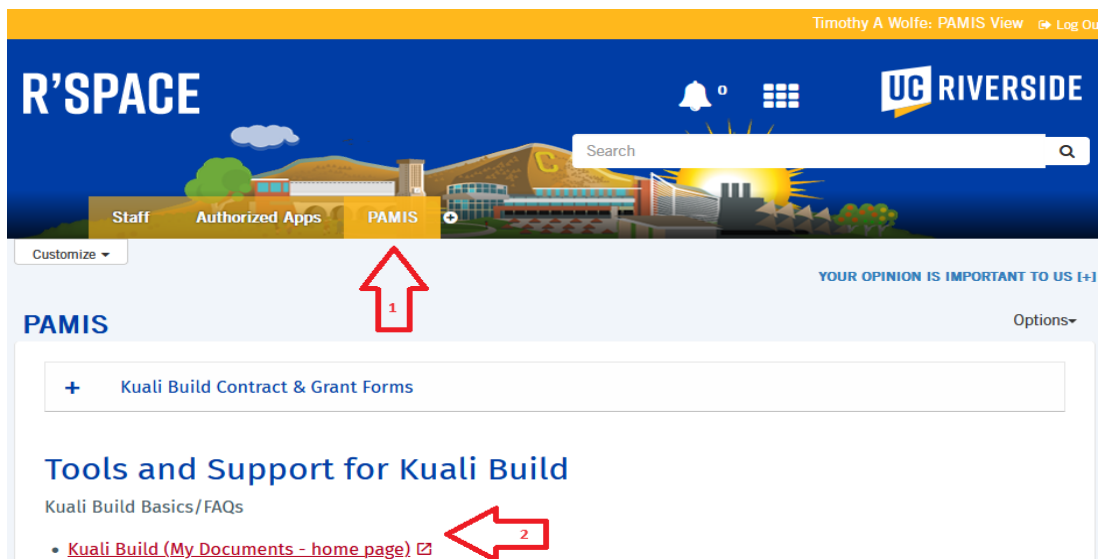
This email was automatically generated.

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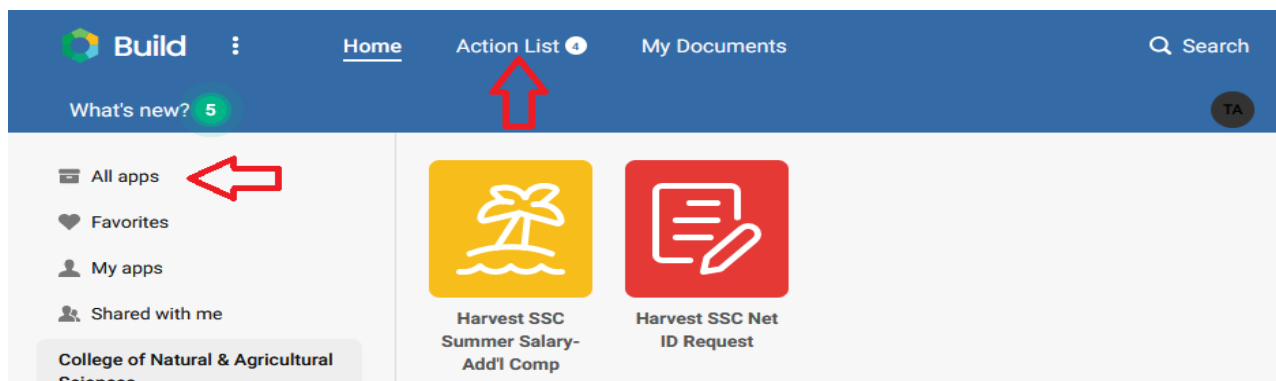
ACCESSING THE KUALI BUILD PREAMWARD SPENDING REQUEST FORM

Upon receiving a PreAward Spending Request email notification (see example above), the RED Officer should access the form by clicking the “**View Task**” link in the email (see above). Alternatively, the PreAward Spending Request may be accessed in either of the following ways:

- By going directly to the apps in Kuali Build, located at <https://ucr.kualibuild.com/build/space/>; or
- By going to R’Space (<http://rweb.ucr.edu>) and clicking on the **PAMIS** tab (as shown below). Under the “**Tools and Support for Kuali Build**” section, click on the “**Kuali Build (My Documents – home page)**” which will take you to the apps in Kuali Build.




Once in the Kuali Build home page, click on “**Action List**” and select the assigned PreAward Spending Request form. Alternatively, choose “**All Apps**” from left-hand column.



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A PreAward Spending Request form, similar to the one below, will appear. Please see subsequent sections for detailed guidance on reviewing and approving PreAward Spending Requests.



PreAward Spending Request

Institutional Proposal # * 00080986	PI's UCR NetID * (Must use lowercase letters only) huinanl	Principal Investigator's Name Huihan Hannah Liu	Department Number D01285	Department Name Bioengineering Dept
Sponsor Name CALIFORNIA INSTITUTE FOR REGENERATIVE MEDICINE				
Prime Sponsor Name (if applicable)				
Project Title CIRM Conference - Manage The 2024 SPARK Annual Meeting				
Anticipated Award Nature		Anticipated Award Type		
Grant		New		
<input type="checkbox"/> Generate a new Kualii Award Number and Chart of Account				

Link this PreAward to the following Kualii Award Number	Please provide the Kualii Award Number K00806001
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Anticipated Budget Period and Amount

Anticipated Budget Start Date April 1, 2024	Anticipated Budget End Date April 30, 2025	Total Funds Anticipated this Budget Period \$110,000.00
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PreAward Spending Request for Time and/or Funds

The PreAward spending period (i.e., the period of time prior to the official award start date) must not exceed ninety (90) calendar days, *contingent upon sponsor guidelines*. If the sponsor is a Marketing Board, the PreAward period must not exceed the six (6) month period preceding the official award start date.

PreAward Start Date * March 1, 2024
PreAward End Date * May 31, 2024
Total PreAward Funds (\$) Requested * Requests should not exceed estimated expenditure levels for the PreAward spending period. For example, a 90-day PreAward associated with a one-year award should not exceed 25% of the annual budget. \$27,500.00

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Justification of PreAward Spending Request

Submitting this Pre-Award Spending Request for PI-Huinan Liu (Institutional Proposal: 00080986) to accrue expenditures regarding the 2024 SPARK Annual Meeting

Exception

Requested PreAward Funds Exceeds Maximum Allowed

No

Requested PreAward Period Exceeds Maximum Allowed

No

PI Certification and Approval

By signing below, I certify that:

- (i) PreAward Spending is essential and critical to meet project objectives;
- (ii) a PreAward budget has been established; and
- (iii) expenditures will not exceed the approved PreAward amount.

PI Signature *

Date

March 5, 2024

Alternate COA (dept)

The Alternate COA must be an unrestricted funding source. The alternate COA will be charged, to cover unfunded PreAward expenditures incurred, in the event the funding is not received or in the event the PreAward period does not coincide with the project period of the funded award.

Department Approver Commitment *

Department Approver Commitment options

Commitment option #1: Department Approver has committed the indicated Alternate COA to cover unfunded PreAward costs in the event RED is unable to obtain a firm commitment from the sponsor. Proceed only if a firm commitment can be established from the sponsor.

Commitment option #2: Department Approver has committed the indicated Alternate COA to cover unfunded PreAward costs in the event RED is unable to obtain a firm commitment from the sponsor. Proceed even if a firm commitment cannot be established.

Commitment option #3: The Department Approver supports this request, but does not have sufficient funds. (Choosing this option routes the form to the Org. Approver/Dean)

Commitment option #3 (Department Approver supports this request, but does not have sufficient funds.)

Alternate COA (org)

The Alternate COA must be an unrestricted funding source. The alternate COA will be charged, to cover unfunded PreAward expenditures incurred, in the event the funding is not received or in the event the PreAward period does not coincide with the project period of the funded award.

Organizational Approver Commitment *

Organizational Approver Commitment options

Commitment option #1: Organizational Approver has committed the indicated Alternate COA to cover unfunded PreAward costs in the event RED is unable to obtain a firm commitment from the sponsor. Proceed only if a firm commitment can be established from the sponsor.

Commitment option #2: Organizational Approver has committed the indicated Alternate COA to cover unfunded PreAward costs in the event RED is unable to obtain a firm commitment from the sponsor. Proceed even if a firm commitment cannot be established from the sponsor.

Commitment option #3: The Organizational Approver is unwilling to commit the Organizational COA.

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RED Approver
Funds (\$) approved by Research and Economic Development (RED) *
RED Comments on Approved Funds *
Assistance Listing Number (if applicable)
Confirmation of Firm Commitment from Sponsor *
PreAward Authorized Under Sponsor’s Terms *
RED Notes
Is a soft return to the C&G Analyst needed for correction(s)? *
For a hard return (i.e., re-routing required), select No and then click Send Back to Form Submitter. If no corrections are necessary, select No and then click Mark Complete to forward to RED Final Approver.

Comments			
Comment	Name	Date	Time

Attachments		
	Document Category	Description of Document
CIRM SPARK CONFERENCE_PREAWARD REQUEST.pdf (286.8 kB)	Other	
No file attached		

RED Final Approver	
When sending the form back, please insert comments, in the Comments section of the form, indicating the necessary changes/corrections/additions required for further review.	
The PreAward Spending Request Approval is contingent upon: (i) receipt of all applicable financial disclosures by Research Compliance; and (ii) approval of all applicable regulatory matters.	
RED Final Approver Signature	Approval Date

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

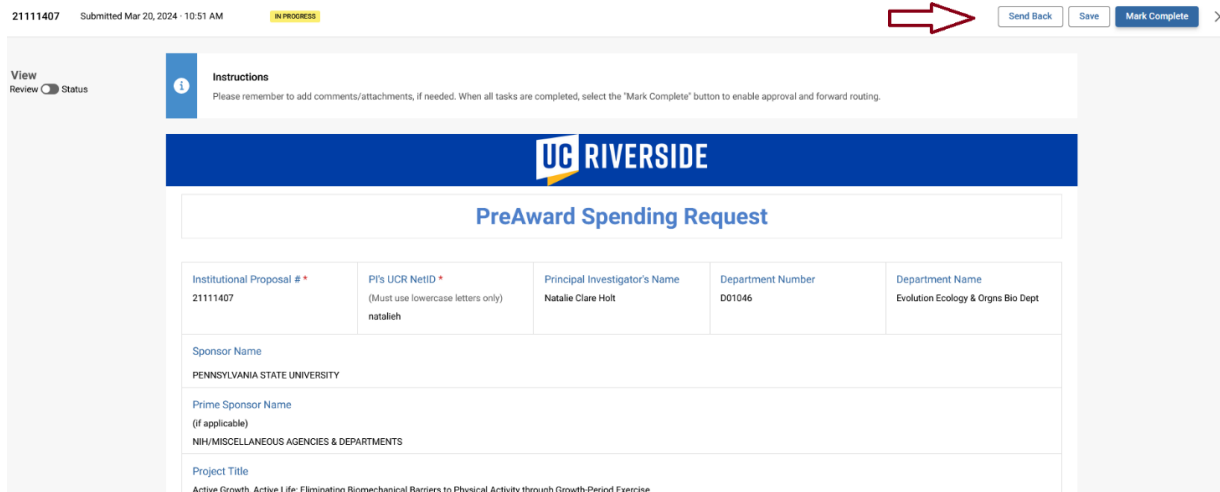
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REVIEWING A PREAWARD SPENDING REQUEST

ACTIONS OVERVIEW

Within the menu on the right side of the form, the RED Officer will find the **Actions** menu with the following three options:

- **Mark Complete**
- **Save**
- **Send Back**



21111407 Submitted Mar 20, 2024 - 10:51 AM IN PROGRESS Send Back Save Mark Complete X

View
Review Status

Instructions
Please remember to add comments/attachments, if needed. When all tasks are completed, select the "Mark Complete" button to enable approval and forward routing.

UC RIVERSIDE


PreAward Spending Request

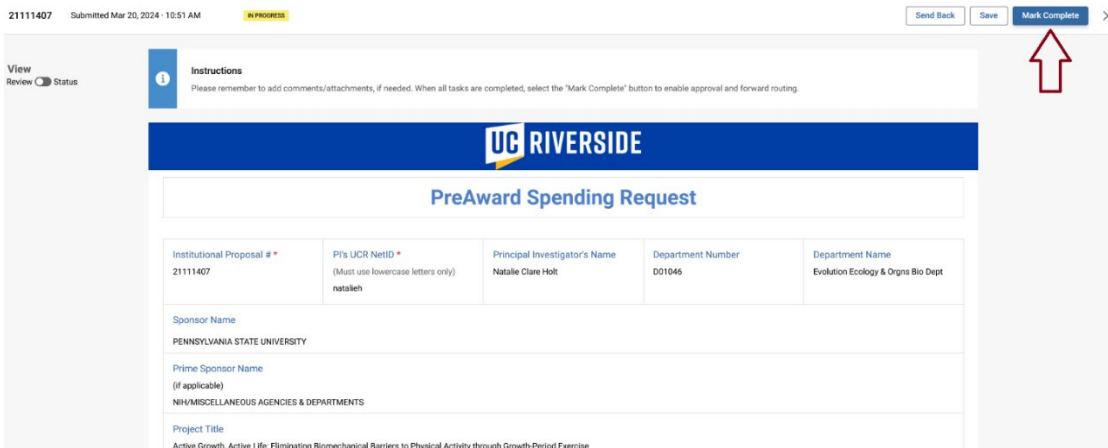
Institutional Proposal # *	PI's UCR NetID *	Principal Investigator's Name	Department Number	Department Name
21111407	(Must use lowercase letters only) natalieh	Natalie Clare Holt	D01046	Evolution Ecology & Orgns Bio Dept

Sponsor Name
PENNSYLVANIA STATE UNIVERSITY

Prime Sponsor Name
(if applicable)
NIH/MISCELLANEOUS AGENCIES & DEPARTMENTS

Project Title
Active Growth, Active Life: Eliminating Biomechanical Barriers to Physical Activity through Growth-Period Exercise

 **Mark Complete.** To route a PreAward Spending Request ‘forward’ (i.e., Submit to RED Final Approver), the RED Approver needs to complete the form as described below and then click “Mark Complete.”



21111407 Submitted Mar 20, 2024 - 10:51 AM IN PROGRESS Send Back Save Mark Complete X

View
Review Status

Instructions
Please remember to add comments/attachments, if needed. When all tasks are completed, select the "Mark Complete" button to enable approval and forward routing.

UC RIVERSIDE

PreAward Spending Request

Institutional Proposal # *	PI's UCR NetID *	Principal Investigator's Name	Department Number	Department Name
21111407	(Must use lowercase letters only) natalieh	Natalie Clare Holt	D01046	Evolution Ecology & Orgns Bio Dept

Sponsor Name
PENNSYLVANIA STATE UNIVERSITY

Prime Sponsor Name
(if applicable)
NIH/MISCELLANEOUS AGENCIES & DEPARTMENTS

Project Title
Active Growth, Active Life: Eliminating Biomechanical Barriers to Physical Activity through Growth-Period Exercise

 **Save/Send Back (Soft Return).** To ‘return’ a PreAward Spending Request to the Departmental

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Analyst for correction(s) or withdrawal, the RED Officer must: (i) click “Yes” under “Is a soft return to the C&G Analyst needed for correction(s)?” question and a comment box will open; (ii) insert a comment (under the Comment section) as to why the request is being returned and click ‘Save’; and (iii) click the second “Send Back” button at which point the system will return it to the appropriate contact along with an automated system-generated email notifying the analyst that the PreAward Spending Request has been returned.

21111407 Submitted Mar 20, 2024 - 10:51 AM IN PROGRESS Send Back Save Mark Complete ×


View Review Status

Instructions
Please remember to add comments/attachments, if needed. When all tasks are completed, select the 'Mark Complete' button to enable approval and forward routing.

UC RIVERSIDE

PreAward Spending Request

Institutional Proposal # *	PI's UCR NetID *	Principal Investigator's Name	Department Number	Department Name
21111407	(Must use lowercase letters only) natalieh	Natalie Clare Holt	001046	Evolution Ecology & Orgns Bio Dept
Sponsor Name PENNSYLVANIA STATE UNIVERSITY				
Prime Sponsor Name (if applicable) NIH/MISCELLANEOUS AGENCIES & DEPARTMENTS				
Project Title Active Growth, Active Life: Eliminating Biomechanical Barriers to Physical Activity through Growth-Period Exercise				

 **Send Back (Hard Return).** On occasion,* where correction(s)/change(s) necessitate the request to be re-routed to the PI and Departmental Approver/Organizational Approver (as applicable) for approval, the RED Officer will need to send back via a hard return.

**For example, re-routing via a hard return would be necessary to continue the PreAward Spending Request 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) only authorized the use of the Alternate COA in the event a Firm Commitment could be obtained; and (iii) the Departmental Approver (or Organizational Approver) now needs to authorize use of the Alternate COA even if a Firm Commitment cannot be established.*

To perform a hard return: (i) select “No” under the question, “Is a soft return to the C&G Analyst needed for correction(s)?”; (ii) complete the “Comments” section that appears below the question; and (iii) click the “Send Back” button at which point the system will return it to the appropriate contact and send an automated system-generated email notifying them that the PreAward Spending Request has been returned.

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- ✚ Once a request is returned to the RED Officer, **following a soft or hard return, and where no further corrections are necessary**, select No under “Is a soft return to the C&G Analyst needed for correction(s)?” and then, after the RED Officer has completed his/her review of the request (including completion of all applicable required fields), insert a comment under the Comments section, hit ‘Save’, and then click ‘Mark Complete’ to forward to RED Final Approver.

PREAWARD SPENDING REQUEST FORM REVIEW

This section will go through each field of the PreAward Spending Request form.

1. Institutional Proposal #. Verify the correct Institutional Proposal Number was selected (i.e., that it is the funding proposal associated with the anticipated award under the PreAward Spending Request).

- ✚ The Institutional Proposal # field auto-populates certain other fields on the form, including the Department Code and Department Name. If a correction to the Institutional Proposal # is required, this is an instance where a Hard Return is necessary.



PreAward Spending Request

Institutional Proposal # * 00078633	PI's UCR NetID * (Must use lowercase letters only) hughesc	Principal Investigator's Name Nigel C Hughes	Department Number D01055	Department Name Earth & Planetary Sciences Dept
Sponsor Name AMERICAN ASSOCIATION OF PETROLEUM GEOLOGISTS				
Prime Sponsor Name (if applicable)				
Project Title The Ocean of the Top of Our Mountain				

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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.

Anticipated Award Nature	Anticipated Award Type
Cooperative Agreement	Renewal

✚ 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, **and** is issued under the same Sponsor Award Number.
- **Continuation:** means an award that conveys the next budget increment for a multi- year award as originally proposed to the sponsor and indicated in the Institutional Proposal. 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 own Institutional Proposal ID (e.g., proposals to add new tasks and/or deliverables to be performed, for additional funding, during the term of an existing project).

Anticipated Award Nature	Anticipated Award Type
Cooperative Agreement	Renewal

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4. In the following section below, there are four different radio buttons that can be selected by the Form Submitter. Depending on which radio button is selected by the Form Submitter, there will be different fields that will auto-populate for completion by the Form Submitter. As applicable, RED Officer should review Sponsor Award Number and Kualiti Award Number are correct.

- **Chart of Account (Subject to Change)**

<input checked="" type="radio"/> Chart of Account (Subject to Change) <input type="radio"/> Generate a new Kualiti Award Number and link to the following Chart of Account <input type="radio"/> Generate a new Kualiti Award Number and Chart of Account <input type="radio"/> Link this PreAward to the following Kualiti Award Number	Please provide the Chart of Account Number	Please provide the Sponsor Award Number	Please provide the Kualiti Award Number
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- **Generate a new Kualiti Award Number and link to the following Chart of Account**

<input type="radio"/> Chart of Account (Subject to Change) <input checked="" type="radio"/> Generate a new Kualiti Award Number and link to the following Chart of Account <input type="radio"/> Generate a new Kualiti Award Number and Chart of Account <input type="radio"/> Link this PreAward to the following Kualiti Award Number	Please provide the Chart of Account Number
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- **Generate a new Kualiti Award Number and Chart of Account**

<input type="radio"/> Chart of Account (Subject to Change) <input type="radio"/> Generate a new Kualiti Award Number and link to the following Chart of Account <input checked="" type="radio"/> Generate a new Kualiti Award Number and Chart of Account <input type="radio"/> Link this PreAward to the following Kualiti Award Number

- **Link this PreAward to the following Kualiti Award Number**

<input type="radio"/> Chart of Account (Subject to Change) <input type="radio"/> Generate a new Kualiti Award Number and link to the following Chart of Account <input type="radio"/> Generate a new Kualiti Award Number and Chart of Account <input checked="" type="radio"/> Link this PreAward to the following Kualiti Award Number	Please provide the Kualiti Award Number
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5. Anticipated Budget Period and Amount. RED Officer must confirm the *Anticipated Budget Start Date* and *Anticipated Budget End Date*, listed in the PreAward Spending Request, are consistent with the Budget Period outlined in documentation from the Sponsor (e.g., the letter of commitment or email obtained from the sponsoring agency’s authorized representative). In addition, RED Officer must confirm the *Total Funds Anticipated in this Budget Period* is consistent with the amount listed in the documentation from Sponsor (e.g., letter of commitment or email obtained from the sponsoring agency’s authorized representative). Note: If RED has an official NOA or agreement (i) but the award terms are under negotiation and the sponsor confirms that the project period will not alter despite the continuing negotiations; or (ii) the NOA start date exceeds 90 days into the future, then a PreAward Request may be appropriate.


Anticipated Budget Period and Amount		
Anticipated Budget Start Date	Anticipated Budget End Date	Total Funds Anticipated this Budget Period
September 1, 2023	August 1, 2024	\$507,857.00

6. PreAward Spending Request for Time and/or Funds. The RED Officer must confirm the requested PreAward Start Date and PreAward End Date 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. If the PreAward Spending request exceeds such PreAward Period limitation, the RED Officer 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.

 **Exception:** CA Marketing Boards Awards (see UCR Campus Policy 550-80 *Pre-Award Guidelines*).

 **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.

Furthermore, the RED Officer must confirm the *Total PreAward Funds (\$) Requested* 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 RED Officer 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. RED Officer 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).

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PreAward Spending Request for Time and/or Funds	
The PreAward spending period (i.e., the period of time prior to the official award start date) must not exceed ninety (90) calendar days, <i>contingent upon sponsor guidelines</i> . If the sponsor is a Marketing Board, the PreAward period must not exceed the six (6) month period preceding the official award start date.	
PreAward Start Date *	September 1, 2023
PreAward End Date *	December 31, 2023
Total PreAward Funds (\$) Requested *	\$24,000.00
Requests should not exceed estimated expenditure levels for the PreAward spending period. For example, a 90-day PreAward associated with a one-year award should not exceed 25% of the annual budget.	

7. Justification of PreAward Spending Request. 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. RED Officers 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 hard return “Send Back” option (as described above) with applicable comment inserted in the comment field.

Justification of PreAward Spending Request	
Requesting NCE in order to spend existing funds while renewal agreement is processed. Agreement finalized with sponsor.	
Exception	
Requested PreAward Funds Exceeds Maximum Allowed	Requested PreAward Period Exceeds Maximum Allowed
No	No

8. PI Certification and Approval. Please confirm that the PI has signed the following certifications: i) PreAward spending is essential and critical to meet project objectives; ii) a PreAward budget has been established; and iii) expenditures will not exceed the approved PreAward amount.

PI Certification and Approval	
By signing below, I certify that:	
(i) PreAward Spending is essential and critical to meet project objectives; (ii) a PreAward budget has been established; and (iii) expenditures will not exceed the approved PreAward amount.	
PI Signature *	Date
Mary Lu Arpaia	December 18, 2023

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9. Alternate COA (dept). Signature approval and commitment 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. The Alternate COA must be an unrestricted funding source. The alternate COA will be charged, to cover unfunded PreAward expenditures incurred, in the event the funding is not received or in the event the PreAward period does not coincide with the project period of the funded award. Note: A PreAward may proceed without the Sponsor's firm commitment if the Department 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.

Alternate COA (dept)

The Alternate COA must be an unrestricted funding source. The alternate COA will be charged, to cover unfunded PreAward expenditures incurred, in the event the funding is not received or in the event the PreAward period does not coincide with the project period of the funded award.

Department Approver Commitment *

Department Approver Commitment options

Commitment option #1: Department Approver has committed the indicated Alternate COA to cover unfunded PreAward costs in the event RED is unable to obtain a firm commitment from the sponsor. Proceed only if a firm commitment can be established from the sponsor.

Commitment option #2: Department Approver has committed the indicated Alternate COA to cover unfunded PreAward costs in the event RED is unable to obtain a firm commitment from the sponsor. Proceed even if a firm commitment cannot be established.

Commitment option #3: The Department Approver supports this request, but does not have sufficient funds. (Choosing this option routes the form to the Org. Approver/Dean)

10. Alternate COA (org). If the Department Approver is unable to authorize the use of an alternate COA in the event losses are incurred because of the PreAward, then approval and commitment must be obtained by the appropriate Dean or Vice Chancellor whose office will provide the use of an alternate COA ("Organizational Approver"). The Alternate COA must be an unrestricted funding source. The alternate COA will be charged, to cover unfunded PreAward expenditures incurred, in the event the funding is not received or in the event the PreAward period does not coincide with the project period of the funded award. Note: A PreAward may proceed without the Sponsor's firm commitment if 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.

Alternate COA (org)

The Alternate COA must be an unrestricted funding source. The alternate COA will be charged, to cover unfunded PreAward expenditures incurred, in the event the funding is not received or in the event the PreAward period does not coincide with the project period of the funded award.

Organizational Approver Commitment *

Organizational Approver Commitment options

Commitment option #1: Organizational Approver has committed the indicated Alternate COA to cover unfunded PreAward costs in the event RED is unable to obtain a firm commitment from the sponsor. Proceed only if a firm commitment can be established from the sponsor.



Commitment option #2: Organizational Approver has committed the indicated Alternate COA to cover unfunded PreAward costs in the event RED is unable to obtain a firm commitment from the sponsor. Proceed even if a firm commitment cannot be established from the sponsor.

Commitment option #3: The Organizational Approver is unwilling to commit the Organizational COA.


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SPA’s Review & Approval of PreAward Spending Requests

11. RED Approver

-  **Funds (\$) Approved by Research and Economic Development (RED).** In this field, the RED Officer 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.
-  **RED Comments on Approved Funds.** In this field, the RED Officer shall notate any unusual circumstances regarding the requested amount or duration. At minimum, the RED Officer shall comment on whether the request complies with the UCR Campus Policy #550-80.


RED Approver
Funds (\$) approved by Research and Economic Development (RED) * \$25,000
RED Comments on Approved Funds * PreAward Spending amount is less than 25% of the anticipated Award amount.

-  **Assistance Listing Number (if applicable).** Insert the Assistance Listing Number (formerly CFDA Number), if applicable. If none, then leave blank. The 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 an Assistance Listing number. The 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 Assistance Listing Number was not included in the Award, then the RED Officer should look up such number in the Assistance Listing located at <https://sam.gov/content/assistance-listings>. In the event of a federal contract, use the applicable two-digit prefix to identify the federal agency followed by the numbers ‘999’ as the three-digit program code suffix.

Assistance Listing Number (if applicable) N/A
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-  **Confirmation of Firm Commitment from Sponsor.** Confirmation of a Firm Commitment from Funding Agency (Select Yes or No). A Firm Commitment is the official award or written commitment from the Sponsor’s authorized official confirming the anticipated award period and amount.

Confirmation of Firm Commitment from Sponsor *

- Yes
- No

Confirmation of Firm Commitment from Sponsor *

Yes


-  **PreAward Authorized Under Sponsor’s Terms** (Select Yes or No). 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. **CAUTION:** 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 Spending Request should not be approved since any costs incurred would be disallowed.

PreAward Authorized Under Sponsor's Terms *

- Yes
- No


PreAward Authorized Under Sponsor's Terms *

- Yes
- No

-  **RED Notes.** The RED Notes field may be used or viewed by anyone in the PreAward Spending Request routing chain listed under the “Approval Status” tab to relay pertinent information not addressed elsewhere in the PreAward Spending Request or to seek clarification and/or any necessary changes. For instance, the RED Officer may soft return the request to the Departmental Analyst with no re-routing required and use this comment field to request any necessary revisions, or the RED Officer may hard return with re-routing required and include the reason in the notes section. RED Officer 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, RED Officer 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 “Send Back” option (as described above) with applicable comment inserted on the Comment section.

RED Notes

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 **Is a Soft Return to the C&G Analyst Needed for Correction(s)?** If a Soft Return is needed, select Yes, insert a comment advising what correction(s) are necessary, and click Send Back. If a Soft Return is not required (i.e., either there are no corrections necessary or the corrections necessitate a Hard Return), then select No.

For a hard return (i.e., full re-routing required): (i) select “No” under the question, “Is a soft return to the C&G Analyst needed for correction(s)?”; (ii) complete the “Comments” section that appears below the question; and (iii) click the “Send Back” button at which point the system will return it to the appropriate contact and send an automated system-generated email notifying them that the PreAward Spending Request has been returned.



Is a soft return to the C&G Analyst needed for correction(s)? *

For a hard return (i.e., re-routing required), select No and then click Send Back to Form Submitter. If no corrections are necessary, select No and then click Mark Complete to forward to RED Final Approver.

- Yes
- No

12. Comments. Insert comments and notes. The RED Officer 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.

Comments

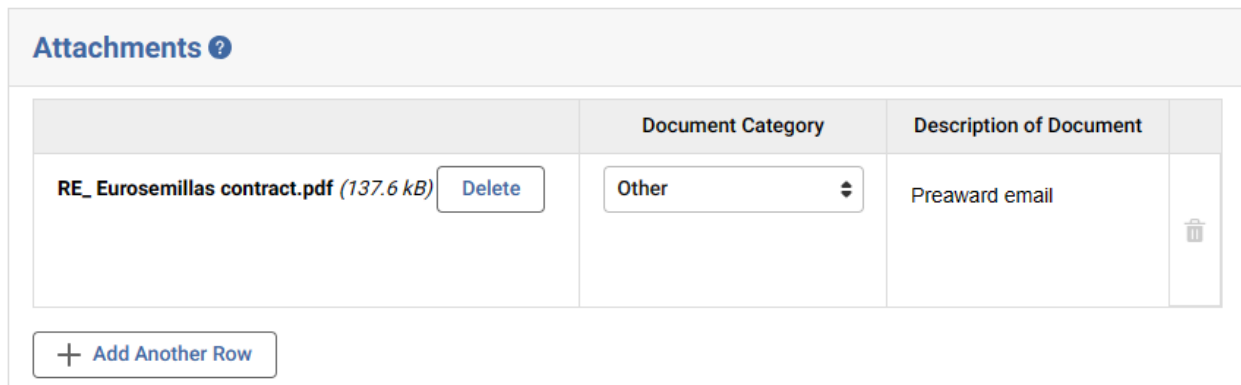
Comment	Name	Date	Time	
		<input type="text"/>		

+ Add Another Row

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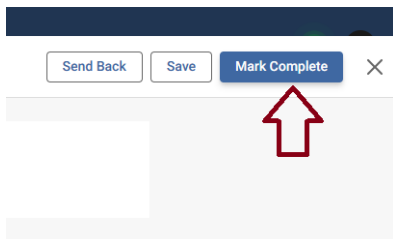
13. Attachments. The RED Officer should thoroughly view all documents to determine if there is a Firm Commitment from the Sponsor, or a written letter/email from the Sponsor, providing an updated estimate of when UCR can expect to receive the fully executed Award. The attachments should also include 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 section.



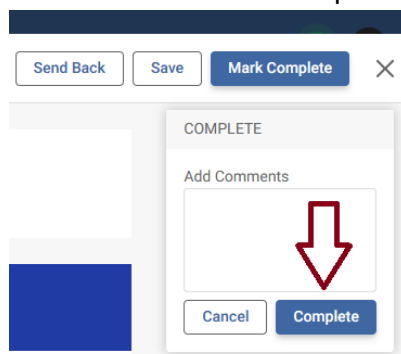
Attachments ?		Document Category	Description of Document
RE_Eurosemillas contract.pdf (137.6 kB)	Delete	Other	Preaward email

+ Add Another Row

14. Mark Complete (By RED Officer). Once the form is complete as outlined above, click the “Save” button and then “Mark Complete” in the Actions menu on the upper right side of the form.



A dialogue box will open prompting the RED Officer for a comment. Insert the appropriate comment and click “Complete.”

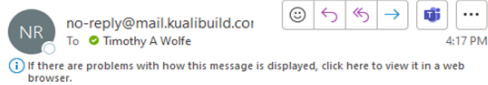


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SPA’s Review & Approval of PreAward Spending Requests

15. RED Officer Approval (Email Notification): Once the RED Officer clicks the “Complete” button, a system generated email will be issued to the RED Officer. The RED Officer will select the “Begin Review” button embedded in the email and will be directed to the Quali Build form, this time with the action to approve the request (as shown in the sample email below).

RED Officer Approval Needed re: PreAward Spending R...



Hello Timothy,

Please remember to add comments/attachments, if needed.

Form Name: **PREAWARD SPENDING REQUEST**
Step Name: **RED APPROVER**
Your Action: **APPROVAL**



This email was automatically generated.


IMPORTANT NOTE: The first step is for the RED Officer to “complete” the form, and the second step is for the RED Officer to “approve” the request. See screenshot below for an overview of the workflow.

RED Approver Task - RED - Officer Approvers

Waiting for Task Completion | (All Roles) 


- Timothy A Wolfe
- Cynthia J Johnson
- Charles E Greer
- Tim P LeFort
- Karen S Garcia
- Victoria Sissac
- Ursula N Prins
- Misty Madero
- Robert R Chan
- Tammy Whetter
- Victoria M Van Mouwerik
- Patrick Wagman
- Eric Castellanos Ramos
- Ian Naftzger

RED Approver - RED - Officer Approvers

Approval | (All Roles) 

- Timothy A Wolfe
- Cynthia J Johnson
- Charles E Greer
- Tim P LeFort
- Karen S Garcia
- Victoria Sissac
- Ursula N Prins
- Misty Madero
- Robert R Chan
- Tammy Whetter
- Victoria M Van Mouwerik
- Patrick Wagman
- Eric Castellanos Ramos
- Ian Naftzger

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-  **RED Officer Approval.** When “Begin Review” is selected within the notification email, a separate browser window will open.

Please remember to add comments/attachments, if needed.

Form Name: **PREAWARD SPENDING REQUEST**
Step Name: **RED APPROVER**
Your Action: **APPROVAL**



This email was automatically generated.

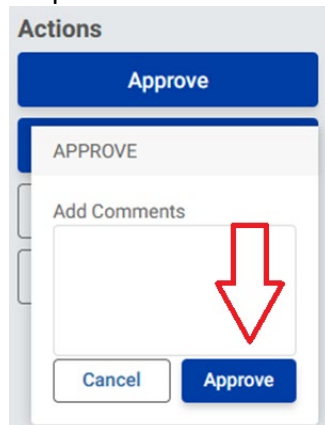
This is the final opportunity for the RED Officer to confirm the information previously completed, so please take the opportunity to check that all the information is correct.

Within the menu on the right side of the form the RED Officer will find the **Actions menu** with the following four options: **1) Approve; 2) Save; 3) Send Back; or 4) Deny**

- **Approve:** If the information appears to be correct, the RED Officer may approve the PreAward Spending Request by clicking the “Approve” button.

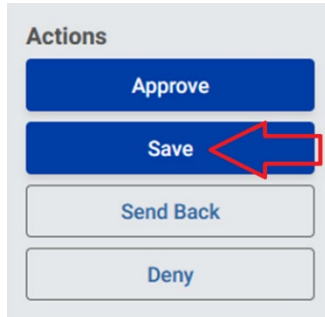


A dialogue box will open for the RED Officer to leave a final comment. Clicking “Approve” once more will cause the system to auto-route the PreAward Spending Request to the RED FINAL APPROVER.



Research & Economic Development – Internal Procedure SPA’s Review & Approval of PreAward Spending Requests

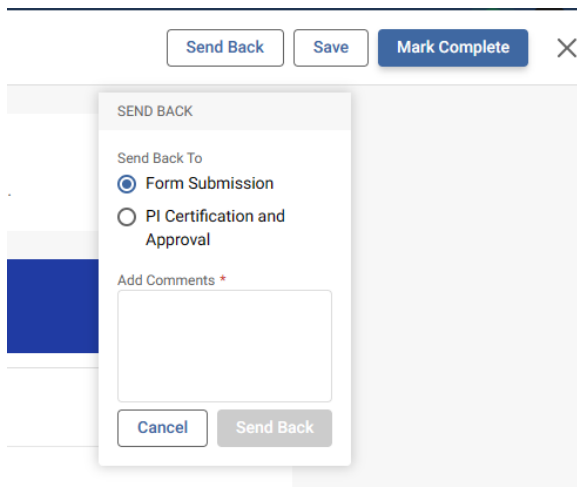
- **Save:** To Save the form in order to revisit the form for review at a more convenient time, click “Save.”



- **Send Back:** To ‘return’ a PreAward Spending Request to the Departmental Analyst for correction(s) or withdrawal, the RED Officer must click “Send Back.”



After clicking “Send Back,” a dialog box will appear with the option to select “Form Submission,” (to send back to the Form Submitter); or “PI Certification and Approval,” (to send back to the PI for certification and approval). Furthermore, the RED Officer should insert a comment to explain the reason the request is being sent back.



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- **Deny:** To deny the request, click the “Deny” button and insert a comment explaining the reason for the denial in the pop-up comment box, then click “Deny” again.



If the RED Officer approved the form, the below confirmation screen will display, and an automated email will be sent to the RED Final Approver.



This form has been approved.



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16. RED Final Approver. Upon receipt of the PreAward Spending Request automated email, the RED Final Approver will click on the ‘Begin Review’ button in the body of the email which will take them directly to the PreAward Spending Request for final review and approval. If there are items that need further addressing (e.g., more information, clarity, confirmation or correction), the RED Final Approver will address those items in the Comments section and click the ‘Send Back’ button which will return the PreAward Spending Request to the RED Officer. If the RED Officer needs to obtain such further information, clarity, confirmation, or correction from the departmental analyst, PI, and/or the Department/Organizational Approver (as applicable), then the RED Office will need to utilize the soft or hard return feature (as applicable). Once the request is ultimately routed back to the RED Final Approver with no outstanding items, the RED Final Approver will sign and date the request in the RED Final Approver section of the form, then click the appropriate action (e.g., Approve or Deny).

RED Final Approver
When sending the form back, please insert comments, in the Comments section of the form, indicating the necessary changes/corrections/additions required for further review.
The PreAward Spending Request Approval is contingent upon: (i) receipt of all applicable financial disclosures by Research Compliance; and (ii) approval of all applicable regulatory matters.
RED Final Approver Signature Charles E. Greer, Jr.
Approval Date October 11, 2023

✚ **Upon RED Final Approval:** Once the RED Final Approver approves the request, a separate automated email notification is sent to the departmental analyst stating the following: “The PreAward Spending Request has been approved, contingent upon: (i) receipt of all applicable financial disclosures by Research Compliance; and (ii) approval of all applicable regulatory matters. Please be advised that the RED Officer will begin processing a PreAward in the Kualu Research Award module. Once processed, a Campus Award Notice will be generated indicating when PreAward spending may commence.”

Similarly, an automated email notification is concurrently sent to the applicable RED Officer instructing that individual to process a PreAward in the Kualu Research Award module (as shown in the below sample email).

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SAMPLE EMAIL:

From: no-reply@mail.kualibuild.com <no-reply@mail.kualibuild.com> on behalf of Kualiti Notifications <no-reply@mail.kualibuild.com>
Sent: Tuesday, February 6, 2024 10:32 AM
To: Robert R Chan <robert.chan@ucr.edu>
Subject: PreAward Request Has Been ApprovedPhysics and Astronomy Dept Jing Shi



The PreAward Spending Request has been approved, contingent upon: (i) receipt of all applicable financial disclosures by Research Compliance; and (ii) approval of all applicable regulatory matters.
Please process a PreAward in the Kualiti Research Award module once all contingencies have been resolved, then generate a Campus Award Notice authorizing the commencement of PreAward spending.
[Click to visit](#)

This email was automatically generated.

NOTE: PreAward spending may then commence once the PreAward has been posted to Oracle PPM and the affiliated Campus Award Notice has been emailed.

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Research & Economic Development – Internal Procedure SPA’s Review & Approval of PreAward Spending Requests

EXHIBIT A

Exhibit A: UC Contract and Grant Manual, Chapter 6-300, “Expenditure Advance Based on a Firm Commitment,” retrieved 12/06/2023, last revised unknown.

<https://www.ucop.edu/research-policy-analysis-coordination/resources-tools/contract-and-grant-manual/chapter6/chapter-6-300.html>

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.

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EXHIBIT B

- **Exhibit B: UCR Policy 550-80: “PreAward Spending,”** retrieved 12/06/2023, last revised 1/12/16. <https://policyking.ucr.edu/home/policy/6539d1030ad0f868b8663690>

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 RSpace 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: <http://cnc.ucr.edu/Pre-Award/>
- UCR Sponsored Programs Administration, Pre-Award Administration and Spending: <https://research.ucr.edu/spa/lifecycle/pre-award-administration.aspx>

Contacts

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

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EXHIBIT C

- **Exhibit C: UCR Sponsored Programs Administration webpage.** “PreAward Administration and PreAward Spending,” retrieved 12/06/2023, last revised unknown.
<https://research.ucr.edu/spa/lifecycle/preaward>

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 Request for Exception to Policy Regarding PI 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 Chart of Account 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 COA (“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.

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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, a [PreAward Spending Request](#)  must be submitted.

Requesting Modifications to Previously Approved PreAwards

It may be necessary to increase the expenditure level and/or PreAward performance period previously authorized via a PreAward Spending Request form. To seek such a modification (provided the fully executed Award associated with the initial PreAward request has not subsequently been received and processed through Kualii), please submit a "[Modified PreAward Spending Request](#) " form.

Please refer to [Campus Policy #550-80](#)  (PRE-AWARD POLICY) for additional PreAward policy and procedural information.

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SPA’s Review & Approval of PreAward Spending Requests

EXHIBIT D

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 Institutional Proposal in Kualu; 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 COA (or Alternative ORG COA, 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: 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 RED Officer 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.

5. 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).

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SPA’s Review & Approval of PreAward Spending Requests

6. 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.

7. Q: Should the RED Officer 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 RED Officer 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.

8. 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 PreAward Spending Request along with the appropriate Alternate COA.

9. 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.

10. 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.

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SPA’s Review & Approval of PreAward Spending Requests

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

A: SPA RED Officer’s shall review Online PreAward Spending Requests within 24-48 hours of receipt.

12. 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 Research Integrity department, then Research Integrity 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 Research Integrity 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).
- 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.)