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Purpose

This Points of Reference document includes guidance for PFG applicable when submitting a majority of applications for sponsored support. This is general guidance for the majority of proposal applications and is not intended to be inclusive of all applications.

PFG Institutional Compliance Review

"**Complete Review**" in ERA marked when:

➤ **Review of Funding Opportunity Announcement (FOA) for:**

- ❖ Type of Funding Announcement – Some sponsors publish both generic program descriptions and highly specific funding announcements that deviate from normal procedures.
- ❖ [Proposal Deadline Management](#) – Some FOAs provide a “hard” deadline, while others give a “soft” (target) deadline that uses a range of dates
- ❖ Organizational Limits – Some FOAs will restrict types of organizations that can apply. Check the [Institutional Eligibility](#) chart to ensure that ASU is permitted to apply for the funding opportunity.
- ❖ RA needs to provide confirmation that the PI has been given approval to submit to an FOA with an organization cap on the number of proposals. [Limited Submission](#).
- ❖ Sponsor – Ensure that FOA sponsor matches ERA sponsor.
- ❖ Minimum and/or Maximum Caps – Some sponsors cap the amount that can be requested or the project period of performance.
- ❖ Watch for costs the FOA Allows and/or Prohibits including a funding cap on those budget items.
- ❖ Review FOA for Indirect Cost (F&A) Restrictions – Sponsors will allow Institution’s fully burdened rate, cap the rate at a specific percentage, or will prohibit F&A entirely.
- ❖ [Cost Sharing](#) – The FOA may specify that cost sharing is mandatory, voluntary, or prohibited.
- ❖ Title Requirements – Look for any required prefixes or suffixes that must appear in title of proposal.
- ❖ Submission Requirements – Some sponsors require materials to be submitted via email, while others provide an online portal. Often a single SB is required, but documents may sometimes be sent separately. There

may also be situations where multiple submission methods must be used for a single proposal. Look for these and similar specifications.

- ❖ **Review for Terms & Conditions** which can be defined as general and special arrangements, rules, provisions, requirements, rules, specifications, and standards that form an integral part of an agreement or contract.
- ❖ Check for **Native American** Involvement.
- **Contract Negotiation Guidance**. This is the list of the most common items that we come across in PNT. If you see these words in your FOA or RFP, or Post Submission Item, you should contact your Lead for further direction.
- **FDP Clearinghouse Pilot**. A list of all the participating entities can be found [here](#). For instances in which RAs receive requests for subrecipient commitment forms, the first step will now be for them to check the list to see whether the institution requesting the form is part of the pilot.
 - ❖ **If they are not on the list**: RA will complete the requested form.
 - ❖ **If they are on the list**: RA informs the requester that they have noticed their institution is participating in the FDP Clearinghouse Pilot, and that ASU is as well. [Sample Pilot Language](#) has been provided by the FDP for all participating institutions to use (diplomatically). If a participating institution persists in requiring full subrecipient commitment forms, RA will contact Proposal GCO for next steps.
 - ❖ PNT GCO is also responsible to double check whether or not sponsor is on the Pilot list.
- Match ERA to SB/FP for:
 - ❖ Title
 - ❖ PI:
 - ✓ Senior Key Persons listed in SB/FP are also in ERA
 - ✓ Sponsor PI meets eligibility requirements
 - ❖ Total Budget Amount (within \$20)
 - ❖ Project Period
 - ❖ Correct Sponsor/Sponsors listed in ERA. A) TBD Sponsors need AD (Lead is backup) approval to submit. B) When there are more than 2 flow down sponsors, the "Prime Sponsor" MUST be the entity from which funds originated, and "Sponsor" must be the organization that directly gives ASU the money, especially when Federal is the Prime Sponsor!!! Additional

sponsors through which the money flows to ASU should be listed in "PNT Review Update or Complete" Action Item as a note to AMT.

- Review Cover Page or Cover Letter: Check for accurate administrative information including correct email (ASU.Awards@asu.edu), DUNS, & IRS number found in [Standard Institutional Information](#), ORSPA phone numbers, etc.
- Confirm that there is a Statement of Work: PFG always sends some form of a SOW with a budget because the PI must state how the funds will be used.
- Review Budget:
- Review Budget Justification:
 - ❖ Manually calculate Budget to confirm correct F&A.
 - ❖ F&A rate appears reasonable. Any exception to a fully burdened rate should be [supported by](#) (1) the Funding Announcement, (2) Sponsor website, (3) Waiver form (FAW) or (4) [ASU Sponsor Limited List](#).
 - ❖ Check that project amount(s) along with start & end dates are consistent within the application between Cover Page, & Budget pages.
 - ❖ Sponsor budget limitations (such as F&A cap, allowable direct costs, etc.) are met.
 - ❖ Check that total budget amounts and project period dates are consistent within subaward budgets.
 - ❖ [Mandatory Annual Escalation Factor](#) of 3% must be utilized unless permission granted from Director of Above.
 - ❖ [Equipment](#):
 - ❖ Software costs should NOT be factored into the cost of equipment unless cost exceeds \$5 million.
 - ❖ [CAS qualifications](#)
 - ❖ Fabrication (def): Equipment that is constructed by combining or assembling modular components and/or materials into one identifiable unit which will result in Capital Equipment. An instance where components are simply connected together in a system, such as when individual computers and servers are joined to create a network, does not constitute a fabrication.
 - ❖ [Participant Support Costs](#): Confirm that [Participant Support Costs](#) are correctly categorized.
 - ❖ ERA often represents total project amount

- Review Budget Justification:
 - ❖ To ensure the budget justification correctly verbalizes the budget going to the sponsor. See "Budget Building Information" section here in [Proposal Information and Resources](#).
 - ❖ Review [Cost Sharing or Match](#)

Litmus Test to determine when to request RA revisions to Proposal Application?

- When the application package will draw an error keeping it from submission.
- When a proposal could be returned without review for administrative noncompliance of items that PNT is responsible to review or at discretion of GCO, depending on time constraints.
- When we can offer a suggestion(s) that will avoid probable post submission tasks (like NSF and its request for detailed travel justification).
- PFG never asks for more than what the sponsor requires, except that there should be a SOW if an amount is shared with the sponsor.

Notes for AMT housed in Action Item



- Hourly Rates Proposed
- Terms & Conditions matters
- Small Business Plan included in application
- [Cyber Security](#) (Data IT Security)
- Unresolved Proposal Issues including cost share, F&A etc.
- Account set up/award management items
- Additional sponsors through which money flows to ASU

Notify PFG Lead for approval of submission, especially when **Cost Share signatures are pending at time of submission** and:

- Cost Share is voluntary and more than salary/effort
- AND commitment confirmation cannot be obtained via email or by phone from the PI/RA
- AND commitment from third party cannot be confirmed

Notify PFG Lead for approval to submit Proposals that:

- have an **FAW** that is not **fully signed**
- must be submitted in **DRAFT STATE**
- have a **TBD title**

- have a **TBD sponsor**

Notes of Interest - Basic

- PFG does NOT provide signatures on documents until the proposal is reviewed when application can be submitted without AOR.
- Managing proposals with foreign currency budget requirements: When an FOA requests a budget in foreign currency, it is best to include the verbiage "The estimates of non US dollars are furnished solely for the purpose of this proposal. It is understood that the University will be compensated in the amount of US Dollars stipulated in this proposal in order to meet the scope of work."
- [AMT Team Structure](#)
- Guidance Document [Subrecipient VS Vendor VS Consultant](#)
- [True Fellowships](#), when sponsored by non-federal funds, may or may not run thru ORSPA at the discretion of RAS & Dept.
- Where to direct Research Administrators for assistance:
 - ✓ RAhelp@asu.edu is where RAs can ask process & procedure questions.
 - ✓ ERA@asu.edu (or 480-965-9065, option 0) is for ERA Technical Support.
 - ✓ [Limited Submission](#): Hayley Bohall; Limited.Submissions@asu.edu; (480) 727-3954.