

Pre-award Points of Reference (POR) – KE-Sponsored Proposals

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Purpose

This *Points of Reference* document includes **internal guidance** for Knowledge Enterprise – Sponsored Proposals (KE-SP), applicable when submitting applications for sponsored support. This is general guidance and is not intended to be exhaustive.

KE-SP Institutional Review

Mark **Complete Review** in ERA and provide any required signatures, letters or certifications when review of the following is complete:

Funding Opportunity Announcement (FOA)

- Ensure that the RA has entered FOA information into ERA per [ERA funding Proposal Guide](#).
 - Only if you verify that there is no FOA, Q2 of the proposal Smart Form 1.4.2 (non-S2S submissions) can indicate 'No FOA.'
 - Confirm that the sponsor and prime sponsor entered into ERA aligns with the FOA or available information.
 - Report any [Flagged Sponsors](#) to the appropriate team and affirm approval to proceed.
- Identify any atypical information. Some sponsors publish funding announcements that deviate from general program guidance.
 - Note that a Request for Proposal (RFP) may involve more complicated guidance, terms, and conditions that require additional scrutiny and consideration.
- Determine what type of [Proposal Deadline Management](#) should be used—some FOAs provide a **hard deadline**, while others give a **soft (target) deadline** that encompass a range of dates.
 - Refer to SmartForm *4.1 Submission Dates & Delivery Information*. If information conflicts with FOA, confirm info with RA as they have final determination on deadline.
- Check for any **Organizational Limitations**: 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.
- Check for any Submission Limitations: Some FOAs restrict number of proposals per applicant. Ensure that the RA has provided confirmation that PI has been given approval to submit ([Limited Submission](#)).
 - There are FOAs in which the limit on applications per organization extends to subawards. Limited Submissions is aware of these situations and will be responsible for tracking both lead and subaward applications.
 - Pre-Proposals may also be under a limited submission opportunity; confirm RA has approval from the Limited Submission Office to proceed with any program restricted LOIs.
- For questions regarding PI eligibility, refer to [ASU's definition of a PI](#). If the external PI does not meet ASU's definition, an internal PI must be listed in ERA.
- Identify any minimum and/or maximum caps. Some sponsors cap the amount of funding that can be requested, the project period of performance, and/or [F&A rates](#).
- Watch for **allowable and/or prohibited costs** mentioned in the FOA, in addition to any funding caps on allowable costs (e.g., senior personnel limited to two months' effort).
- Make note of any [Cost Sharing](#): amount, mandatory, voluntary, or prohibited.
- Look for **Title Requirements** (e.g., NSF "Collaborative Research")
- Note any **submission requirements** (e.g., email, sponsor portal, etc.)
- There are situations when [ASUF should not be listed as an applicant](#) on charitable gifts/grant proposals.

- Prepare an RFP review for submissions that require the acceptance of **Terms & Conditions** at proposal stage.
 - **Escalated clauses and keywords:** The [Prepare proposal checklist](#) and [Reviewing an FOA guide](#) identifies items within the FOA, RFP, or Post Submission task that may require additional review and outreach prior to submission. GCOs and RAs should plan for extra time and communication.
 - The following items may indicate sponsor enforcement of non-standard terms. Contact the Pre-Award Manager for further guidance.
 - Arbitration, dispute resolution
 - Classified information, confidential, secret, cleared personnel/facility, FAR 52.204-2 security requirements
 - Confidentiality, proprietary, non-disclosure
 - Data/IT/Research/Cyber security, controlled unclassified information (CUI), privacy, DFARS 252.204-7997, NIST SP 800-171, CMMC
 - Exclusivity
 - Export control
 - Governing law & venue, jurisdiction
 - Indemnity/liability, warrants, damages
 - Insurance
 - Intellectual property, ownership, patents, copyrights, licensing, private use, technology transfer
 - Invoicing/penalties, non-performance, interest, fine
 - Non-standard payment
 - Physical security requirements, badging, fingerprinting, background check, clearance, facility access
 - Publication restriction, pre-/prior publication approval
 - Termination, default, stop-work

Comparing ERA against a Sponsor Bundle (SB) or Full Proposal (FP)

- Proposal title
- Principal Investigator (PI)
 - Senior Key Persons listed in SB/FP are also in ERA
- Total budget amount (within a range of \$20)
 - Exception: Prime sponsor awards a subrecipient that doesn't flow through ASU, such as a National Lab or Federally Funded Research and Development Center (FFRDC). In alignment with the [Reviewing a Funding Announcement Guide](#), any project costs that will not be awarded to ASU should be excluded from the ERA Current Budget, even if they appear in sponsor-required budget forms.
- Project period of performance
- Correct sponsors:
 - Proposals that have sponsors listed as "TBD" in ERA need Mgr. approval before submission.
 - When there are more than two 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 a Federal entity is the Prime Sponsor.

- Additional sponsors should be listed under the “PNT Review Update or Complete” Action Item to AMT.
- Special Review Items: Check the ‘Department Review Info’ tab to ensure Special Reviews are identified for any proposals involving Human Subjects, Lab Animals, Native American Involvement or Export Controls. A project with Special Reviews may require Research Compliance, so it is important to ensure this record is accurate.

Cover Page

- Review Cover Page and/or [Cover Letter](#): In addition to the items noted in ‘Comparing ERA against SB or FP,’ check for accurate [Standard Institutional Information](#), including Contacts, UEI and EIN.

Statement of Work

- Confirm that there is a Statement/Scope of Work included with the proposal, even in unusual circumstances when the SOW will remain internal.

Budget

- Ensure that the F&A rate is correct. Any limitation on a fully burdened F&A rate must be supported by at least one of the following:
 - The funding announcement
 - Sponsor website
 - A fully approved F&A Waiver (FAW)
 - [Internal Limited F&A List](#)
- Request further justification for [off-campus F&A rates](#) as appropriate. An [Off-Campus Rate Calculator](#) is available to aid RA in determination.
- **NOTE:** Departments need to exhaust every possibility to obtain documentation to support the use of a **reduced F&A rate**.
 - In cases where the resulting agreement is the only support, inform the Pre-Award Manager. Once efforts to obtain the policy detailed in the agreement have been exhausted, leadership may provide a one-time review.
- Check that project amount(s) and the period of performance are consistent within the application, its cover page, and its budget pages.
- Confirm that sponsor budget limitations (such as F&A cap, allowable direct costs, etc.) are met.
- Confirm that Budget Justification supports budget figures, provides the sponsor’s required level of detail, and aligns with [ASU’s best practices](#).
- Check that total budget amounts and project period dates are consistent within **subaward** budgets
- Unless expressly prohibited in writing by the sponsor, escalation must be budgeted on salaries and ERE for each year of the project. If a sponsor has indicated a limitation but does not provide a written policy, inform Pre-Award Manager. **NOTE:** Any start date of six months or more into a fiscal year will calculate in ERA using the following fiscal year’s rates.
- Ensure that any [Capital Equipment](#) is appropriately budgeted.
- Ensure that any [Participant Support](#) is appropriately budgeted.
- Ensure that any additional justification needed for [CAS exceptions](#) is included.
- Ensure that [Sponsored Management Solutions and Support \(SMSS\)](#) is appropriately budgeted for non-federal funding.
- Budgets of **\$1 million or more in direct costs per year** undergo a second review by KE-SP colleague.

- Per-Period ERA budgets should only be used when a detailed ERA budget is disadvantageous or dysfunctional due to sponsor formatting. All per period budgets require internal justification.
- On a **case-by-case basis**, the following types of zero dollar (\$0) Sponsor Budget Proposals can be Full Proposals in ERA:
 - Step Proposals, Phased Proposals
 - Proposals for ASU Consortiums
 - Cost Sharing budget of \$1 or more
- Indefinite Dollar, Indefinite Quantity (IDIQ) proposals are processed as pre-proposals unless a dollar amount is tied to them.
- Effort for a GRA should be defined in terms of person-months (academic, summer). A GRA is salaried staff with benefits and includes tuition. When a graduate student is being paid by the hour, they should be identified as an hourly graduate assistant or as an hourly graduate student.

Processing Modifications (_Rev Sites)

- Modifications record additional funding on existing awards – (e.g., NSF REU, NIH travel supplements, expansion of current SOW). In some cases, _Rev sites are created to align ERA Proposal data with the associated ERA Award.
- In cases of incremental funding, the GCO should check the original FP site and corresponding AWD site to ensure the proposed Rev funds are new and not double-counting already captured funds.
- If there is uncertainty about the modification, confirm/inquire with the RA:
 - Is an agreement anticipated or in-house?
 - Will the award number remain the same as the original award?
 - Is there a substantial change in the scope of work?
 - Has the FOA changed?
- If you receive the modification as part of the proposal site, ensure that PNT review is complete, move the site to “Submitted,” and create a MOD task in ERA Agreements.
- In situations when an RA has generated a new FP site that is actually a modification, we want to make sure that AMT is notified under the “PNT Review Update and Complete” action as follows:
 - [Date] AMT Notes [GCO Reviewer Initials]: AWDXXXX
 - Note: If the site is in DRAFT state, check if RA can void the site and generate a _Rev site.
- The RA process for creating modification sites can be found on the Research Administration site [here](#)

FDP Clearinghouse

- ASU is a part of the [Federal Demonstration Partnership](#). The [FDP Expanded Clearinghouse](#) is a single web-based repository for FDP entities to enter, maintain and update entity related information about their organization. Member institutions are only required to complete the Subrecipient Letter of Commitment when collaborating together (v. a full Subrecipient Commitment Form).

Organizational-Consulting Conflicts of Interest (OCCI)

- Refer to the [OCCI sharepoint](#) for resources.

Project-Specific and Institutional Certifications

- KE-SP manages [Project Representations and Certifications](#) and [Institutional Certifications](#), even when a proposal has been moved to the “Awarded” state.

- The level of authorization is determined by the type of certification. Inform units that certifications may require additional time to engage relevant teams (Research Compliance, Contracting Services, etc.)

International Research

- [Visual Compliance](#) checks are run on foreign organizations for both full proposals and pre-proposals with institutional commitments
- If at any time an RA mentions that a sponsor or subaward is a foreign organization, run a Visual Compliance check at that time; refer to the [Visual Compliance Job Aid](#) for instructions
- Refer to [international research and global collaborations](#) for FAQs and additional resources. Research Compliance also provides an [International Research Compliance and Security Checklist](#).
- When sponsors request the budget in a foreign currency, units create the budget in USD and then convert to the foreign currency for the sponsor forms. The RA will need to utilize a foreign currency converter and screenshot the currency rate noting the date and time that the rate was pulled. Request the following disclaimer in the budget justification –
 - *The estimates of non-U.S. dollars are furnished solely for the purpose of this proposal and reflect exchange rates as of the proposal submission date. It is understood that the University will be compensated in the amount of U.S. dollars stipulated in this proposal in order to meet the scope of work.*
- ASU's preference is for proposal submissions and payments to be in United States (U.S.) dollars. Reasons for avoiding other currency either in proposal submissions or awards include:
 - Currency values rise and fall; when ASU engages in international business transactions, a swing in currency value can have an impact on the project's bottom-line cost. What is budgeted today may be completely inadequate six months from now and may result in the ASU principal investigator's department having to internally fund a project to ensure successful project completion.
 - ASU may also be subject to foreign-transactional fees, also called currency-conversion fees. These fees could be between 2 and 3 percent of the payment made to ASU and may not be reimbursed as a miscellaneous expense. If categorized as un-reimbursable, the ASU principal investigator's unit will be required to cover the cost.
- Value-added tax (VAT): Foreign taxes charged for the purchase of goods or services in-country.
 - Refer to [Global Operations Tax Liabilities](#) and the [Direct Costs sitelet](#) if VAT requirement appears in the FOA. While an allowable cost per [Uniform Guidance](#), ASU's position is to eschew liability for potential VAT.

Process for Jeopardy Proposals

- Follow this two-step process to encourage timely submission of proposals:
 - **Step 1:** ~Eight hours prior to submission, contact RA via ERA to acknowledge the proposal is due soon. Confirm deadline details and inquire when proposal will be ready for submission.
 - **Step 2:** For proposals in the Jeopardy period (four hours prior to deadline), 'Email RA' in ERA with the following:
 - "This proposal will soon be within four hours of submission and in Jeopardy of not making deadline. Please inform when you plan to have the application finalized for submission and if Sponsored Proposals can be of assistance."