

# Keck School of Medicine

## Internal Policy of Proposal Review & Approval

### Introduction

The Dean of the Keck School of Medicine (KSOM) recognizes the critical contribution of sponsored contract and grant funding to the School and that support to the faculty in the grant and contract proposal process is essential to ensuring timely and successful grant and contract submissions. The purpose of this policy is to communicate and clarify the roles and responsibilities of the Principal Investigators (PIs) and their Departments as well as the roles and responsibilities of the KSOM Research Administration and USC Department of Contracts and Grants in facilitating grant and contract reviews and approvals prior to submission to the sponsoring agency.

### Policy and Procedures

All grants and contracts, including new, competitive renewals, and non-competing continuations submitted for sponsored funding must be reviewed and approved by the Principal Investigator's Department, KSOM Research Administration (on behalf of the Dean), and USC's Department of Contracts and Grants. This review process is tracked via Kuali Coeus (KC), the electronic proposal routing and approval system at USC. The KC system utilizes an electronic Proposal Approval Review (PAR) to ensure that (1) the PI receives academic review by the Department Chair or delegate, (2) the proposed budget is accurate and adequate, (3) the proposed work is compliant with Sponsor and University regulations, and (4) special requests, such as reduced F&A, cost sharing, non-faculty PI status are addressed prior to grant submission.

PIs are strongly encouraged to initiate the routing of the KC PAR along with the Administrative Review materials at least five business days in advance of the sponsor's published deadline to allow for adequate time for review by the Department, the School's Office of Research Administration and DCG. The Department's review is required prior to transmitting the KC PAR to KSOM Research Administration unless there is a request or exception that may be obtained concurrently with the KSOM Research Administration review but prior to forwarding routing the KC PAR and proposal to the Department of Contracts and Grants.

The Administrative Review materials to be submitted to KSOM Research Administration and the Department of Contracts and Grants should include:

- Completed KC PAR questions
- Written documentation of sponsor policies specifying F&A rates below federal negotiated levels, salary caps, or unallowable costs
- Project summary or abstract
- Budget and budget justification
- Subcontract package if applicable (sub face page or letter with authorized official signature)
- Copy of the Funding Opportunity Announcement (FOA) if not available via grants.gov

For non-competitive continuations of Federally Sponsored grants, the Key Personnel Report (KPR) must accurately reflect effort charged to the grant over the previous grant year and effort variations greater than 25% of the specific amount on the budget of the previous year should be explained in the progress report (e.g. if 10% effort was specified for an individual on the budget of the previous year an explanation for less than 7.5% is required).

### Responsibilities for the Submission of a Grant or Contract Proposal

#### The Principal Investigator should:

- Prepare the technical and scientific narrative
- Follow the sponsor's instructions
- Prepare a detailed budget and budget justification (even with modular grants) using salaries obtained from the respective Departments of key personnel
- Completed KC Proposal Approval Review (PAR) form, especially indicating reduced F&A rates, and cost sharing and PI certification
- Obtain approvals from all KSOM Departments and Divisions outside the PI's administrative unit and from Deans and Departments from other Schools for key personnel<sup>1</sup> participating in the study<sup>1</sup>
- Route KC proposal to KSOM Research Administration for Dean's office approval at least five business days in advance of the sponsor's deadline

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<sup>1</sup>Key Personnel are the program director/principal investigator (PD/PI) and other individuals who contribute to the scientific development or execution of a project in a substantive, measurable way, whether or not they request salaries or compensation. Proposals with multi-PIs will automatically route to the PI's USC's administrative unit, all others should receive an adhoc FYI. A courtesy communication is strongly encouraged if the key personnel is not in the PI's administrative unit.

The Department, Center, and Institute should:

- Review Administrative Review materials for adherence to sponsor guidelines and USC policy<sup>2</sup>
- Provide the PI with current salary information for staff and FSMS<sup>3</sup> institutional base salary for faculty
- Provide Provost approved salary escalations for period of grant
- Review for scientific and academic merit and provide feedback to PI
- Check budget calculations and provide assistance to PI as required for corrections
- Indicate support for reduced F&A rate requests, cost sharing, or other special requests
- Notify PI and/or PI's Administrator that the proposal is ready to be transmitted to KSOM Research Administration

KSOM Research Administration will:

- Perform Administrative Review of budget, budget justification and scope of work including correct use of fringe benefit rate and F&A rate and adherence to sponsor and university guidelines
- DCG is not privy to School faculty and staff personnel information therefore verify of KSOM faculty and staff salaries and job titles are performed at the School level
- Review requests for reduced F&A rates, cost sharing and additional/special exceptions. Exceptions may only be approved at the School level.
- Provide feedback to PI and/or Department Administrator if needed
- Approve on behalf of the KSOM Dean and Research Dean

Department of Contracts and Grants will:

- Review KC PAR for completeness
- Check PI status and completion of COI and Grants Management Training Requirements
- Review correct use of fringe benefit rate and F&A rate
- Review proposal for compliance with University and sponsor requirements
- Provide feedback to Department, Center or Institute and/or Keck Research Administration as necessary
- Submit application to sponsor or provide validation of institutional approval
- Return KC PAR to PI, Department, Institute or Center and Keck Research Administration, if there are changes
- Go to: <https://research.usc.edu/submitting-a-proposal/> for additional information

Caution: "Same Day" Grant Submissions Are Not Guaranteed Submission

Same Day Grant Submissions are proposals that are (1) received by the KSOM Office of Research Administration on the same day as the sponsor's submission deadline (2) received by KSOM Office of Research Administration prior to sponsor's submission deadline but the proposal materials are not uploaded by PI/Department until the same day as sponsor deadline.

Same Day Grant Submissions result in inadequate review, missed errors, missed deadlines, bumping proposals submitted in advance of the sponsor deadline, and undue stress on department administrators, KSOM Office of Research Administration, and USC Department of Contracts and Grants.

Proposals that require School review or an Authorized Signer submitted on the same day as the sponsors published deadline are not guaranteed to be reviewed and/or successfully submitted to the sponsor. PIs who attempt to submit their proposals on day of the sponsor deadline do so at their own risk.

For questions regarding this internal policy, please contact Janet Stoeckert at [janet.stoeckert@usc.edu](mailto:janet.stoeckert@usc.edu), or Marie Choi at [marie.choi@med.usc.edu](mailto:marie.choi@med.usc.edu).

*\*This policy may be updated from time to time to remain current with University policies and processes and with Keck School priorities*

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<sup>2</sup> Sponsor salary caps and F&A rates are generally honored. If absence of sponsor instructions, USC policy applies.

<sup>3</sup> FSMS stands for Faculty Salary Management System