In order to assist faculty and departmental grant administrators (DGAs) with submitting high quality proposals for external funding, the Office of Sponsored Programs is communicating the reasoning for the recent focus on the enforcement of the four-business day rule. This document is intended to explain the benefits associated with complying to the four-business day rule (the why), as well as to explain what the four-business day rule is and how it is implemented (the how). This document also provides definitions for associated terms and frequently asked questions (the FAQs).

Why:

Providing adequate time in the proposal development, review, and approval process allows for a team-oriented approach to proposal submission. By allowing departmental, PI/Co-PI team, and OSP personnel time to collaborate on proposal submissions, we are taking proactive measures to increase our percentage of funded proposals. Increasing proposal quality increases the chance that the proposal will be funded and can directly impact our remaining R1 goal of increasing the number of Post Docs at the University of Idaho. As a strategic plan goal, ORED is continuously exploring the best way(s) to champion this initiative, and we see the four business-day rule as a major step in the right direction.

The pre-award sponsored programs administrator (SPA) team is trained in all areas of proposal compliance, and will assist faculty with ensuring compliance with university, state, federal, and sponsor policies governing sponsored projects. The SPA team can also enlist the help of university compliance coordinators, the contract review team, and the office of general counsel when needed. Often, proposals will require compliance certifications, compliance checklists, or other entity- or project-specific certification documents, and the pre-award team assists in coordinating those compliance items with the appropriate units on campus.

Compliance processes include (but are not limited to):

- coordination of review and approval of representations and certifications with either Office of General Counsel, OCRI, or the AOR.
- coordination of compliance reviews:
 - o FCOI compliance.
 - o FGTRP compliance.
 - Export control review.
 - IRB, IACUC, Biohazard or radiation safety review (if required at pre-award).
 - Coordination of any environmental or lab safety certifications with EH&S or the Biohazard Coordinator.
 - Coordination and approval from the University tribal liaison.
- coordinating necessary approvals on letters of institutional support/commitment, cost share
 commitment, documentation of university resources and commitment to the project, etc. as
 required by some opportunities. Note: OSP does not draft institutional letters of commitment,
 but they need to be available for review and signature by the appropriate university official no
 later than 14 days prior to submission.

Allowing for adequate time in the proposal approval process also means that proposal approvers (Department Chairs, Cost Share approvers, Deans/Institute Directors, Vice Presidents) can check their VERAS approval queue less frequently without worrying about an emergency approval. It also means fewer phone calls/emails needed to alert such personnel of emergency approvals, saving time for all.

Additionally, with system to system submissions (grants.gov) or agency portal submissions (NSPIRES, Fastlane, research.gov) the submission of a proposal before the due date allows time to utilize the agency validation process to ensure any unforeseen document format, upload, or file issues can be addressed and corrected via a proposal update (or withdrawal and resubmission if needed) in advance of the agency deadline. Most agencies do not allow for submission corrections after the deadline has passed, so planning for and allowing additional time to address any unforeseen submission errors allows the best possible proposal to be submitted to the agency.

Proposals that do not comply with the four-business day policy will receive either limited review (see FAQ) or will not be allowed to move forward with submission. Exigent circumstances will be considered. The OSP Assistant Director, Sarah Martonick, has been delegated the authority to make the determination on limited review or non-submission, and questions or requests for exceptions should be directed to her at smartonick@uidaho.edu.

How:

Start early, communicate often: this is something you will hear from OSP pre-award team consistently. When a proposal is entered to VERAS, an email from VERAS will be initiated by the pre-award team, giving instruction on the four-business day rule and asking that PIs/proposal team members enter a proposal correspondence when they upload documents or they have a question. The pre-award team will review sponsor guidelines upon entry to VERAS, and work with the PI or another member of the proposal team to plan for the submission. Sponsor guidelines which require certifications, cost share, substantial documentation of processes/procedures, have collaborative activities and/or subawards will take more time and coordination than smaller proposals. Starting a proposal entry early in VERAS and communicating with the SPA assigned to your proposal means that all parties will start the process on the same page, understanding their respective roles and responsibilities and the timing requirements better, and increasing efficiency and effectiveness during the submission process.

OSP encourages Pls and proposal development teams to start their proposal in VERAS as soon as they have decided upon a planned submission. This could be two weeks to 6-months or more ahead of the agency's deadline. We ask that Pls and proposal teams use VERAS proposal correspondence to send emails to the SPA and DGA (proposal team members) to plan a timeline for submission, discuss any issues or questions, and to alert the SPA and DGA(s) when documents are uploaded for review. OSP does not receive notices when a proposal is entered to VERAS or when documents are uploaded or updated, so sending communications via proposal correspondence is very important. It allows for all parties to plan review time according to the proposal needs and competing workload. When responding to a VERAS correspondence, be sure to reply all, so that all members of the proposal development team receive the email. See the VERAS manual in Help Tips (in VERAS) for instruction on this.

Final documents (meaning all documents in good enough shape that they could be submitted to the agency that day) must be in VERAS at least four business days in advance of the agency's deadline. If a PI is working with a preferred deadline (not an agency mandated deadline), the four-business day rule still applies (see FAQs for more on this). Having final documents in the system four-business days in advance of the agency deadline allows for a final pre-award team review, any last-minute minor corrections, and

early submission to the sponsoring agency. Before submission can occur, proposals must be routed for approvals in VERAS – allowing extra time for this step has many benefits, as noted above.

Having documents in final form in VERAS four-business days in advance of the deadline does not guarantee an early submission, as there may be components that require coordination in advance of the submission (i.e. approvals in VERAS, final SPA review, and working to clear any errors in the submission portal when applicable). Pre-award team reviews proposals in an order that considers two primary components: when were the documents ready for review (draft and final) and what other proposals are in the queue with similar deadlines (see FAQs for definition). If there are several proposals ready at the same time, with similar deadlines, the pre-award team member (SPA) will prioritize and respond to proposals in the order noted above (date ready, due date). When many proposals are due at the same time, it will take the SPA longer to perform reviews on those competing deadline proposals.

FAQs

Q: What information will PIs receive on the four-business day rule when they enter a proposal into VERAS?

A: The PI and editors will receive the below message when a proposal is entered to VERAS:

"Thank you for entering a proposal to VERAS. The OSP Pre-award team reviews proposals in a first-in, first-out, priority order. Proposals are reviewed in order, based on the date and time that <u>all</u> required proposal documents are ready for first review (while factoring for similar deadlines). **Proposals must be ready for final review at least four business days prior to the agency (required) deadline**. When multiple proposals are ready for review at the same time, they will be prioritized based on the sponsor due date. Proposals entered after the four-business day deadline or proposals requiring substantive changes within the four business days prior to the agency deadline may receive limited review or may not be approved for submission to the agency. It is very important that the PI or departmental proposal team member(s) communicate with the Sponsored Programs Administrator assigned to this proposal via proposal correspondence as soon as you enter a proposal to VERAS, and as you enter documents or revisions for review. Initial communication allows for formulation of a plan for document review, proposal approvals in VERAS, and agency submission. Communicating as you upload documents or make changes that need SPA review will allow the SPA to plan and balance workload assignments to provide the best service with competing proposal deadlines.

We thank you for your cooperation and look forward to working with you!"

Q: What if I enter a proposal to VERAS and it is due less than four-business days from entry?

A: The Assistant Director of Sponsored Operations will assess whether the proposal can receive a limited review or will not be considered for submission. The PI should add a VERAS proposal correspondence explaining any exigent circumstances to be considered by the pre-award team, so that a full evaluation of the situation can occur before a decision is made. The PI/proposal team will receive the below email if a proposal is either entered with less than four-business days to the submission deadline or if a proposal

exists in VERAS but final documents are missing with less than four-business days to the submission deadline.

Message sent when a proposal is <u>entered</u> to VERAS within the four-day window:

This proposal was entered to VERAS with less than four-business days to the sponsor deadline, and/or the documents are not in final form for OSP review and approvals. Due to this, the proposal will receive a limited review after the SPA has handled all other proposals with similar due dates that were in VERAS and ready for review prior to receipt of the final documents for this proposal. If the SPA cannot perform a limited review without jeopardizing the status of other proposals in VERAS that were entered and ready for review before this proposal, the proposal will not be approved for submission.

Please leave a VERAS correspondence directed to the pre-award team when final documents are ready for review on this proposal.

Message sent when a proposal was in VERAS in advance of the four-day window, but did not/does not have documents camera-ready (and have not communicated and/or planned with their SPA adequately):

Final documents for this proposal are not provided in VERAS and there are now less than four-business days to the sponsor deadline. Due to this, the proposal will receive a limited review after the SPA has handled all other proposals with similar due dates that were in VERAS and ready for review prior to receipt of the final documents for this proposal. If the SPA cannot perform a limited review without jeopardizing the status of other proposals in VERAS that were entered and ready for review before this proposal, the proposal will not be approved for submission.

Please leave a VERAS correspondence directed to the pre-award team when final documents are ready for review on this proposal.

Q: What is defined as 'four-business days' for the purposes of this policy?

A: Four business days is defined as four full 8 hour working blocks. Weekends and holidays are not counted, and if a proposal is due before close of business (5:00 pm pacific) then the day of submission is not counted as a full day. Example: If a proposal is due at 12:00 noon 3/5/21, final documents (see FAQ on what final means) must be ready in the submission portal before 12:00 noon 3/1/21.

Q: What is defined as 'final' in the context of 'documents in their final form'?

A: Documents in their final form is defined as documents in a form that could be submitted to the agency which would not receive a compliance rejection from the agency.

Q: What is defined as 'final' in the context of 'final review?'

A: Final review is defined as the pre-award team members final check of all proposal materials. The materials will generally have been reviewed by the pre-award team member previously, and any

suggested changes will have been made by this point. If a college requirement, the DGA or departmental assistant will also have reviewed the documents by this point. The pre-award team is performing a final compliance check and looking for any final small corrections (spelling, formatting, document format (pdf, png, etc.) and verifying the documents are all in the correct fields of the agency submission portal.

Q: What is defined as a limited review?

A: SPA will review budget for appropriate rates of fringe, F&A, cost share, and will review other mandatory rates as time allows (per diem, mileage, salary, etc.) and do a quick review of the justification and project summary (narrative). No checks for ancillary documents, word counts, margin compliance, etc. will occur unless the SPA can allocate that time without jeopardizing review status of another proposal with a similar deadline. Any resulting system to system (like grants.gov) or agency portal errors (like Fastlane, research.gov, NSPIRES) and/or submission issues will not be able to be addressed by the pre-award team.

Q: What is the definition of a similar deadline?

A: Two business days before and after the hard deadline (example: hard deadline of 1/13/2021 would have a similar deadline defined as 1/11/21 - 1/15/21).

Q: What criteria do the SPAs use to determine proposal review order?

A: The SPAs review each proposal in the order that they are ready for review (first review, subsequent review, and final review) as notified by the PI or DGA (proposal team) via correspondence, while prioritizing further based on the due date (see the definition of similar due date in the FAQs). As an example: If a proposal team member leaves a proposal correspondence on 3/1/21 addressed to the SPA that denotes 'this proposal is ready for first review now' and that proposal is due on 3/12/2021, the SPA would assess what other proposals they have in their queue ready for review (first, subsequent, or final) and are due before or within 2 days of 3/12/2021. If there are six proposal due before 3/12/21, and two due before 3/14/21, but only four of those are ready for review prior to this one, this proposal would be reviewed fifth.

Q: What if I want the SPA to consider a preferred deadline because myself or the proposal team will be unavailable after a certain date (preferred deadline date)?

A: Enter the preferred deadline in the preferred deadline field in VERAS in Section 4 and the agency deadline in the hard deadline field. In your initial communication to the SPA upon entry of the proposal (in proposal correspondence) please explain the importance of the preferred deadline and reason for using it. The SPA will review workload assignments and assess whether or not they can uphold the request for the preferred deadline. If the preferred deadline is during a particularly high volume time, the SPA will work with their team members and Assistant Director to ensure adequate coverage and to do our best to respect the requested preferred deadline. Absent extraordinary circumstances, the preaward team will do our best to meet the preferred deadline requested.

Q: What should I be communicating in proposal correspondence when I enter a proposal to VERAS?

A: The PI or proposal development team member should be informing the pre-award team member of your plans for the proposal development, asking for any assistance on specific requirements (such as clarifying an agency term or requirement), asking for help on any budget creation questions (e.g. what rate do I use for X), and letting the pre-award team member know when you plan to have documents into VERAS for review. You should indicate if you plan to provide cost share (if required in the RFP), work with any subawardees, work with a large interdisciplinary team request, request an F&A waiver, or request a cost share waiver. If you will be on leave or unavailable during the proposal development period or before the proposal due date, note that to the SPA as well for planning purposes. When responding to a correspondence, be sure to hit 'reply all' in your email message.