

University of Kentucky College of Medicine Sponsored Research Administrative Services	Identification M-SRAS 001 Version 3		Contact: SRAS Manager
	Standard Operating Procedure	Date Effective: 10/21/2015 Review Date: 10/21/2016	

Internal Approval Process via the Electronic Internal Approval Form (eIAF) for Non-Clinical Trial Sponsored Project Grant Proposals/Applications

Purpose: The purpose of this operating procedure is to clarify and define the roles of the Principal Investigator (PI), Department Administrator (DA), and the Sponsored Research Administrative Services (SRAS) Staff, with regard to creating, submitting, reviewing and tracking eIAFs (electronic internal approval forms) for sponsored project proposals.

Introduction: Grants and contracts for sponsored projects represent a contractual obligation between the sponsor and the University for the performance of a specific activity through which the sponsor is entitled to receive some consideration or benefits. The contractual obligation is normally documented by a proposal and award combination, contract, or a written memorandum of agreement. The University assumes full legal responsibility for complying with all requirements imposed by the sponsor upon acceptance of grants and contracts for sponsored projects, including a requirement for a report of expenditures or a provision for an audit (refer to University [AR 7:3](#), Policies and Procedures for Soliciting, Receiving, Recording, and Administering Grants and Contracts for Sponsored Projects). In turn, the College of Medicine must ensure its investigators (faculty, staff, post docs, students) are in compliance with all University and sponsor requirements through the completion of this internal approval process at the time of the proposal submission.

Per University policy, the eIAF must be fully routed – completed and certified by all parties – and be received via myUK workflow by the Office of Sponsored Projects Administration (OSPA) -- three business days prior to a sponsor’s proposal submission deadline. Late receipt by OSPA will jeopardize submission of the proposal.

To ensure the University internal deadline is met, the College of Medicine has instituted procedures in this SOP for the preparation and routing of an eIAF. These procedures should be undertaken at least 10 days prior to the university internal deadline. This requires the PI and DA provide to the SRAS GPS the information as outlined in this SOP. In addition, if multiple colleges are involved, additional lead time is recommended.

Procedure: To accurately create, submit, review and track eIAF’s.

1. **The Grant Proposal Specialist (GPS), who is staff in the SRAS office, will create the eIAF.**
 - a. In myUK, and following the instructions as provided by OSPA at <http://www.research.uky.edu/ospa/forms.html>, the GPS will initiate the eIAF form.
 - b. The GPS will enter information into the form as obtained from PI or DA:

- i. All personnel who fit the University's definition of investigator per [AR 7:2](#), Financial Conflicts of Interest in Research. Per the AR, Investigator means the project director or principal investigator/program director, co-investigator, collaborator, senior/key personnel, faculty associate, and any other person, regardless of title or position, who is responsible for the design, conduct, reporting, or proposing of research or other activity that is sponsored by an extramural agency. The GPS will work with the department to determine if a postdoctoral scholar or fellow is considered key personnel, in which case, the GPS will include the postdoctoral scholar or fellow on the IAF. Graduate and undergraduate students are not considered investigators (see exception below). Remember to include those who may not have effort (i.e., other significant contributors on NIH submissions). For students, an exception is if the proposal is a student fellowship, the student should also be included as an investigator.
 - ii. Physical Location of Proposed Activity, if different than the PI's lab space.
 - iii. Alternate responsible unit (if applicable). If alternate unit is the same as the responsible unit, alternate unit field should remain blank.
 - iv. Project Title – use capital and lower case letters. Special characters are allowed (but might not be on the proposal itself). If the program type requires any special naming conventions (like with STTRs or SBIRs, for example), make sure that convention is used.
 - v. Sponsoring Agency, with address as necessary. For subcontract submissions – make sure entity that will provide funds directly to UK is identified as the sponsor
 - vi. Type of deadline and deadline date. For those with NIH continuous submission privileges, use the regular/standard NIH deadline, even if the proposal will be submitted later. Also, for subcontract submissions for another sponsor's deadline, use the prime sponsor deadline on the form.
 - vii. Proposal and Activity type. Activity type must match Facilities & Administration (F&A) rate in proposal, in accordance with sponsor guidelines.
 - viii. Response to questions regarding the use of human subjects, use of animal subjects, use of biohazards, use of radioactive material, equipment purchases, additional space needs, alterations or renovations needed, faculty or staff overload, sub-recipients or outside consultants, use of CCTS resources, involvement of any external non-academic partner. Answers to questions in this section will be checked during proposal review to make certain they agree.
 - ix. The key words section– GPS to request this information from the PI.
- c. The GPS will complete Current Budget and Total Project period dates and funds requested, per draft or final budget. (Creation of the budget is covered in SOP

“Sponsored Project Grant Proposal Budget Development and Proposal Preparation”, of which Step 9 is initiating the eIAF.)

- i. If effort for the PI is not budgeted, the appropriate cost share amount must be included.
 - ii. If no PI effort due to fellowship award or other approved situation, note in the GPS comments attachment.
 - iii. If sponsor has limited or no F&A, University column must reference the difference at the appropriate rate based on the activity type.
 - iv. If F&A cost is the only item needed for University contribution, source of funding field must be noted as “N/A”
- d. The GPS will include a statement about F&A, cost share or limited PI effort in the explanation GPS comments attachment(also include page number reference from the guidelines to any of these limitations).
- e. The GPS will enter the approved enrichment split as provided by the PI’s DA. (See SOP “Sponsored Project Grant Proposal Budget Development and Proposal Preparation” for process of budget and enrichment split review and approval.)
Note: Enrichment split is only included if F&A is recovered. Also, for a scope account project, no enrichment is listed and GPS comment attachment in workflow must reference enrichment is same as prime project.
- f. The GPS submits the eIAF. When the eIAF arrives in the submitting GPS’s workflow, the GPS will attach required documents (guidelines, abstract, draft or final detailed budget including cost share calculation, draft or final justification as the sponsor requires, current IACUC and IRB approvals, if available, and fixed price budget sheet if applicable), add a comments page, and ensure financial disclosure conflict of interest is current for all investigators. The PI and all investigators must complete the on-line financial disclosure at least annually. The GPS will follow up with those who have missing disclosures at the time of the eIAF submission; the eIAF can’t receive GPS approval to continue routing until all disclosures are complete. The GPS will prepare and attach the GPS comment attachment which includes a list of all investigators and dates of their financial disclosure and other relevant or necessary comments that will assist in the OSPA review.
- g. The GPS clicks the “data verify” button; the eIAF will then route to the PI.
- h. PI must certify the eIAF.
- i. eIAF will route to the GPS from the PI based on the responsible unit listed on the eIAF.
- j. The GPS approves the eIAF for the remaining routing.

2. The GPS will track the remaining routing of the eIAF.

- a. The GPS will track the eIAF through remaining routing via SAP ZGM_SWI6. This person will check the status daily.

- b. The GPS will follow up with investigators, chairs, GPSs, CGOs, and deans if delays occur. The GPS will exercise good judgment in this monitoring and follow-up, based on the routing deadline. Goal is for on-time submissions of all eIAFs for which information is provided to the GPS in a timely manner.

Roles and Responsibilities:

Principal Investigator (PI) is responsible for:

- Providing required details needed to complete the eIAF – project title, sponsor, list of investigators, use of human subjects, use of animal subjects, use of biohazards, use of radioactive materials, equipment purchases, additional space needs, alterations or renovations needed, faculty or staff overload, sub-recipients or outside consultants, use of CCTS resources, involvement of any external non-academic partner.
- Providing items to attach to the eIAF – abstract, budget justification, current IACUC and IRB approvals if available.
- Certifying the eIAF.
- Ensure financial disclosure is current.

Department Staff (DA) is responsible for:

- Providing enrichment split.

Sponsored Research Administrative Services Office (SRAS) is responsible for:

- Completing all sections of the eIAF, with PI input, to meet OSPA standards.
- Attaching items to the eIAF – abstract, guidelines, budget, budget justification, fixed price budget sheet, GPS comment attachment.
- Following up with investigators if financial disclosure isn't current.
- Tracking the eIAF daily. Follow up if it is delayed along the way to ensure submission to OSPA to comply with University policy.

Abbreviations

CCTS—Center for Clinical and Translational Science (at UK)

CGO—College Grants Officer (other UK Colleges' counterpart to College of Medicine Grants Proposal Specialists)

DA—Department Administrator

eIAF—electronic Internal Approval Form

F&A—Facilities and Administration rate (indirect cost rate UK negotiates periodically with the federal government that is applicable to most grants)

GPS—Grants Proposal Specialist (located in Sponsored Research Administrative Services)

NIH—National Institutes of Health

OSPA—Office of Sponsored Projects Administration (located in the Vice President for Research Office)

PI—Principal Investigator

SRAS—Sponsored Research Administrative Services