



## INTERNAL SUBMISSION POLICY FOR APPLICATIONS TO EXTERNAL SPONSORS

**Policy Number:** 2.0.2

**Version Number:** 002

**Classification:** Proposal Development and Submission

**Effective Date:** June 2018

**Responsible University Office:** Office of Sponsored Programs

### 1.0 Purpose

In pursuit of its academic mission, Clemson University solicits and accepts funds from extramural sponsors, both federal and non-federal, for the conduct of research, instruction, and public service projects. All proposals for such sponsored projects are submitted in the name of and by Clemson University, and all resulting awards are likewise accepted or executed in the name of and by Clemson University. As a designated Carnegie Classified R1: Highest Research Activity, it is important that Clemson establish and enforce policies and procedures to support excellence at that level.

In order to ensure that Clemson University prepares and submits competitive applications that fulfill the administrative requirements of sponsors and represents the highest quality of Clemson University, it is necessary for Office of Sponsored Programs (OSP) to review every application for conformity to sponsor guidelines, institutional policies, budget accuracy and allowability, acceptable contractual language, and that appropriate internal approvals have been secured. External sponsors are increasingly strict about submission deadlines and application accuracy. Electronic submission systems have built-in business rules that reject applications that are incorrect, incomplete, or formatted incorrectly, making careful and accurate entry of applications increasingly important. It is critical that OSP staff have sufficient time to ensure that the applications are submitted correctly. Compliance with the deadlines stated in this policy will enable OSP to best serve Clemson University faculty by ensuring adequate time to review, revise and process applications.

### 2.0 Applicability

This policy applies to all Clemson University personnel submitting applications for sponsored projects. The Principal Investigator(s) (PI) (Assignment of PI Policy – 1.0.1) on a grant application is ultimately responsible for adhering to the policy.

### 3.0 Government Rules and Regulations

NA

### 4.0 Definitions

**Application:** Includes all required business elements as specified in the sponsor guidelines, to include proposal abstract, narrative, budget, budget justification, cost-share commitments, identification of required resources, biosketches, subcontractor supporting documents, conflict-of-interest disclosures as applicable to sponsor and any other sponsor requirements.

**Business Day:** Weekday that Clemson University is open for business. Excludes weekends and University holidays. Includes business hours from 8 a.m. – 4:30 p.m. Proposals must be received by OSP in time to submit the proposal by close of business on the due date, even when the sponsor deadline is later than 4:30 p.m. The same deadlines apply regardless of whether OSP or the research team submits the proposal to the sponsor.

**Complete Form:** All major business elements of the application are finalized, to include budget, budget justification, senior/key personnel, cost-share commitments, subrecipient documentation and any other commitments by the University or collaborators. Only immaterial grammar or stylistic editorial revisions to the narrative (e.g. project description, abstract, references) are allowed during the final electronic routing process.

**Office of Sponsored Programs (OSP):** All pre-award staff employed by OSP in the Division of Research, and pre-award staff employed by a college with authorization to prepare and submit applications on behalf of Clemson University.

**Ready-to-Submit:** Complete application in final format that is in compliance and ready for submission to the sponsor.

**Timely:** Determined by individual OSP Support Centers.

### 5.0 Policy

Effective July 1, 2013 all applications seeking support from sponsors external to Clemson University must be in “Ready to Submit” (see Section 4.0 – Definitions) format and have received the preliminary approval of the applicable OSP Support Center to electronically route for approval by chairs and associate deans for research *a minimum of two business days in advance of the immediate sponsor deadline*, in order for OSP to guarantee on-time submission. Exceptions: multi-college or multi-institutional applications must be in at least “Complete” format (see Section 4.0 - Definitions) during the final routing

process. Applications that involve more than one department, school, or college must receive the approvals of the chair and associate dean for research of that unit. It is recommended that adequate time be factored in if this is applicable.

Investigators are advised to allow for additional time when the following circumstances also apply:

- College has internal deadline
- Project is inter-institutional
- Project establishes a center or institute
- Cost-sharing is involved
- Project involves foreign collaborators
- Waiver of all or partial Facilities & Administrative Costs
- Times of large volume of submissions (e.g. standard receipt dates for NIH; recurring NSF deadlines)
- Solicitation requires review and approval of Terms & Conditions at time of submission

Exceptions and waivers to this rule will be made only for 1) official university closure, 2) PI or Co-PI serious illness, injury or death of a key personnel, or 3) sponsor documentation that notification of the funding opportunity was made less than two (2) weeks prior to the deadline. Any application received by OSP under an approved waiver will be submitted to the sponsor; however, for those applications requiring submission via Grants.gov or other sponsor electronic submission system, OSP cannot ensure that the application will be transmitted error-free and in time to meet the sponsor's deadline.

OSP staff will do everything possible to get the proposal to the sponsor on time. However, as the amount of time for processing is reduced, the chance for insurmountable obstacles increases. Certain parts of the review process are external to OSP and therefore, are subject to the schedules of other offices. When there is sufficient lead time, OSP staff can compensate for these situations. Therefore, faculty should make every effort to provide the maximum time possible for OSP to process and adequately review their proposals.

## 6.0 Responsibilities

### Office of Sponsored Programs:

- Assistance with proposal preparation prior to submission
- Timely pre-review of applications routed via InfoEd before submission to the sponsor
- Assurance that application materials comply with sponsor and institutional policies and guidelines
- Submission and/or final institutional sign-off of applications through InfoEd
- Receipt, and review and approval of waiver requests

- Receipt, and, review and approval of cost-share requests
- Preparation and distribution of periodic reports sent to the Chair, Dean and Associate Dean for Research reflecting proposal submission data to assist with departmental/college compliance.

**Principal Investigator:**

- Timely provision of all business elements of the application
- Technical and budgetary design of project
- Preparation of applications in accordance with application policies, regulations, and sponsor guidelines
- Preliminary discussion on any cost-share requirements with units expected to cover the cost-share commitments
- Acknowledgement for full responsibility of the scientific, programmatic and financial management of the project
- Timely correction of all required revisions prior to submission deadline

**Department Chairs and Deans/Associate Deans for Research**

- Review and confirm that commitments of faculty and staff effort, and the possible effects of such commitments on the teaching and other obligations of the personnel involved are approved
- Review and approval for equipment, special facilities, space, and other administrative arrangements are realistically estimated and properly stated
- Review and approval of cost-share
- Review and approval of proposed postdoctoral salaries consistent with University policy

Departmental and College approvals constitute an endorsement of all aspects of the proposal.

**7.0 Sanctions for Non-Compliance**


The University may choose not to honor obligations undertaken by faculty or others which have not been properly authorized.

The University reserves the right to refuse to submit the proposal or to withdraw the proposal after submission if a later review of the proposal identifies a deviation from policy or procedure.

If, at the time of submission, OSP does not have sufficient information to assure compliance with any required representations or certifications, OSP reserves the right not to sign the certification documentation regardless of proposal deadlines.

## 8.0 Approval Signatures

This policy has been approved by:

  
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July 1, 2018  
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Tanju Karanfil  
Vice President for Research

DATE

| REVISION HISTORY |                 |   |
|------------------|-----------------|---|
| EFFECTIVE DATE   | REVISION NUMBER | MODIFICATION  |
| July 1, 2013     |                 |   |
| June 2018        | 002             | Addition of "Complete" to Sections 4.0 and 5.0; addition of OSP to Section 4.0; addition of postdoctoral salaries to Dept/ADR responsibilities in Section 6.0; Change in Signature to Section 8.0; general updates for clarity. |
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