Proposal Development and Submission Checklist
Addressing
Tasks, Requirements, and Roles and Responsibilities

Version Date: April 20, 2017

This Checklist identifies the tasks, requirements of Yale and the sponsor, roles and responsibilities, and expectations of faculty, administrators, and the Office of Sponsored Projects regarding the preparation and review of proposals to external sponsors. This Checklist may not be all-inclusive, but is an attempt to highlight the more common activities associated with proposal preparation and submission and to provide resources to assist with those activities. A companion document to this checklist is the ABCs of Sponsored Projects. This document provides terminology, concepts, and issues related to the profession of sponsored projects administration.

Summary

<table>
<thead>
<tr>
<th>Action Item</th>
<th>Responsible Individual(s)</th>
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</thead>
<tbody>
<tr>
<td>✔ Identify potential funding opportunity including relevant sponsor proposal</td>
<td>Principal Investigator</td>
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<tr>
<td>checklist</td>
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<tr>
<td>☐ Verify that Yale and the PI are eligible to submit proposals and receive</td>
<td>Principal Investigator,</td>
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<tr>
<td>an award</td>
<td>Administrator</td>
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<tr>
<td>☐ Complete Sponsored Projects Administration for Faculty training</td>
<td>Principal Investigator</td>
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<tr>
<td>☐ Current MOU is on file for all individuals with a joint Yale/VA appointment</td>
<td>Principal Investigator,</td>
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<tr>
<td>☐ Patent Policy Acknowledgement and Agreement (PPAA) form(s) completed for</td>
<td>Administrator</td>
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<tr>
<td>all personnel identified in the proposal</td>
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<tr>
<td>☐ Appropriate External Interests (COI) disclosure is current for all</td>
<td>Principal Investigator,</td>
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<tr>
<td>responsible individuals</td>
<td>Administrator</td>
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<tr>
<td>☐ Confirm how the application is submitted and that the PI and/or Yale are</td>
<td>Principal Investigator,</td>
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<td>registered, if required</td>
<td>Administrator</td>
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<tr>
<td>☐ Determine budgetary needs</td>
<td>Principal Investigator</td>
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<tr>
<td>☐ Review Funding Opportunity Announcement (FOA) for proposal requirements</td>
<td>Principal Investigator,</td>
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<td>such as: due date, cost sharing (see below), effort, salary limitations,</td>
<td>Administrator</td>
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<tr>
<td>F&amp;A rate limitations, restrictions on certain costs, budget threshold,</td>
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<tr>
<td>developing a reasonable and appropriate budget, program income, RCR plan,</td>
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<td>data security, data safety and monitoring plans, management/sharing plans,</td>
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<td>type of submission, other restrictive language, and unusual requirements</td>
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<tr>
<td>☐ Determine if the proposal/research will require cost sharing. Please note</td>
<td>Administrator</td>
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<tr>
<td>for Federal Applications: According to OMB Circular A-81, voluntary</td>
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<tr>
<td>committed cost sharing will not be taken into consideration during the</td>
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<td>review process unless otherwise stated in the FOA.</td>
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<tr>
<td>☐ Determine if the PI will be participating in the “9 Over 9” program</td>
<td>Administrator</td>
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<tr>
<td>☐ Identify subrecipients/consultants</td>
<td>Principal Investigator,</td>
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<tr>
<td>☐ Review answers on the Regulatory form or TranSum</td>
<td>Administrator</td>
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<tr>
<td>☐ Develop a timeline for proposal development and submission</td>
<td>Administrator</td>
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<tr>
<td>☐ Ensure that individuals requiring permission to be a PI have completed</td>
<td>Administrator</td>
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<tr>
<td>all of the University’s eligibility requirements and that the appropriate</td>
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<td>approvals are in place</td>
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<tr>
<td>☐ Prepare the budget and budget justification; ensure that all F&amp;A type</td>
<td>Principal Investigator,</td>
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<tr>
<td>costs are adequately justified</td>
<td>Administrator</td>
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<tr>
<td>Task</td>
<td>Responsibility</td>
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<td>----------------------------------------------------------------------</td>
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<tr>
<td>Obtain required information and documentation for all subrecipients. Ensure the Subrecipient Information and Compliance form is complete. Also, review subrecipient budget and budget justification to ensure F&amp;A rates are appropriately used and any F&amp;A type costs adequately justified.</td>
<td>Administrator</td>
</tr>
<tr>
<td>Ensure cost sharing approvals are obtained when necessary</td>
<td>Administrator</td>
</tr>
<tr>
<td>Determine if anyone on the budget is on Confidential Payroll and ensure they do not exceed their allotted % effort. Ensure that a cost sharing form is completed</td>
<td>Administrator</td>
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<tr>
<td>Ensure that all the elements of the proposal are complete and in accordance with the sponsor’s requirements and uploaded or prepared properly using PD</td>
<td>Administrator</td>
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<tr>
<td>Route proposal for review and approval</td>
<td>Administrator</td>
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<tr>
<td>Ensure PI is eligible to be PI and that appropriate approvals have been obtained if necessary</td>
<td>OSP Reviewer</td>
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<tr>
<td>Confirm that all individuals identified as have a Yale/VA joint appointment have a current MOU</td>
<td>OSP Reviewer</td>
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<td>Review proposal for Export Controls and escalate for approval as appropriate</td>
<td>OSP Reviewer</td>
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<td>Ensure that that cost sharing form is fully completed and all approvals obtained, if applicable</td>
<td>OSP Reviewer</td>
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<tr>
<td>Review the budget for F&amp;A type costs and ensure adequate justification</td>
<td>OSP Reviewer</td>
</tr>
<tr>
<td>Identify any personnel on the budget supported by Confidential Payroll funds, review effort against allotted time, and ensure that the Cost Sharing Form is completed</td>
<td>OSP Reviewer</td>
</tr>
<tr>
<td>Review the Subrecipient Information and Compliance Form to ensure it is adequately completed. Ensure all documents are attached such as F&amp;A Rate Agreement and FCOI Disclosures when appropriate.</td>
<td>OSP Reviewer</td>
</tr>
<tr>
<td>Review any subrecipient’s F&amp;A agreement in accordance with the requested budget. Also, review subrecipient budget justification to confirm adequate justification for F&amp;A type costs exists.</td>
<td>OSP Reviewer</td>
</tr>
<tr>
<td>Ensure all certifications and terms and conditions agreed to at time of submission are acceptable</td>
<td>OSP Reviewer</td>
</tr>
<tr>
<td>Ensure that the proposal is regulatory compliant and approve or submit proposal</td>
<td>OSP Reviewer</td>
</tr>
<tr>
<td>Resolve any system issues that arise during the development and submission of the application</td>
<td>Administrator, OSP Reviewer</td>
</tr>
</tbody>
</table>
# Proposal Development and Submission Checklist

## Addressing

### Tasks, Requirements and Roles and Responsibilities

<table>
<thead>
<tr>
<th>Principal Investigator (PI)</th>
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<tr>
<td><strong>Action Item</strong></td>
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| | **Does the funding opportunity reference a proposal checklist?** |
| | Some sponsors have proposal checklists to assist the PI in ensuring all the appropriate elements are included in the proposal. Check the funding opportunity to see if the sponsor references such a document. |

<p>| | <strong>Is Yale eligible to propose and receive the award?</strong> |
| | Before starting an application first determine if Yale is an eligible organization to submit the proposal. |
| | Review the funding opportunity |
| | Any question regarding Yale’s eligibility should be directed to OSP. For assistance, click on this link:  <a href="https://your.yale.edu/research-support/office-sponsored-projects/sponsored-projects-contacts">https://your.yale.edu/research-support/office-sponsored-projects/sponsored-projects-contacts</a> |</p>
<table>
<thead>
<tr>
<th>Confirm eligibility to be a PI according to Yale policy.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Confirm PI eligibility according to sponsor requirements.</td>
</tr>
<tr>
<td>Before starting an application first determine if the person proposing is eligible to be a PI AND meets the eligibility requirements of the sponsor.</td>
</tr>
</tbody>
</table>

In order for a faculty member to be a principal investigator (co-principal investigator or program director), the individual must:
- be a full-time employee of the University;
- hold the academic rank of professor, associate professor, assistant professor, senior research scientist/scholar, or research scientist/scholar; and
- have the requisite training, skill, commitment and expertise.

Exceptions to the above eligibility requirements require the approval of the provost, or where appropriate, the dean of self-support units. Exceptions may be made for but are not limited to: associate research scientist/scholar, lecturers, instructors, emeritus faculty and other non full-time appointments.

Review/complete the following:
- Policy 1310: Principal Investigator Eligibility Requirements on Sponsored Projects
  [https://your.yale.edu/policies-procedures/policies/1310-principal-investigator-eligibility-requirements-sponsored-projects](https://your.yale.edu/policies-procedures/policies/1310-principal-investigator-eligibility-requirements-sponsored-projects)
- Form 1310 FR.04: PI Status Request Form
  [https://your.yale.edu/policies-procedures/forms/1310-fr04-pi-status-request-form](https://your.yale.edu/policies-procedures/forms/1310-fr04-pi-status-request-form)
- Form 1310 FR.04: Instructions PI Status Request
  [https://your.yale.edu/sites/default/files/1310fr04-pi-instruction-form.pdf](https://your.yale.edu/sites/default/files/1310fr04-pi-instruction-form.pdf)
- Faculty Handbook
  [http://provost.yale.edu/faculty-handbook](http://provost.yale.edu/faculty-handbook)

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<table>
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<tr>
<th>Sponsored Projects Administration for Faculty training completed?</th>
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<tbody>
<tr>
<td>If no, the proposal will not be submitted to the sponsor by OSP.</td>
</tr>
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</table>

To access the training module:
- Click on [http://yale.edu/training/](http://yale.edu/training/)
  1. Select Office of Cooperative Research under the Narrow Search drop down menu.
  2. Click Search
- Launch [Sponsored Projects Administration for Faculty – Online](http://yale.edu/training/)

This is a one-time requirement. If uncertain as to status, contact your business office or OSP for assistance.

<table>
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<tr>
<th>Yale/VA joint appointment?</th>
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<tr>
<td>If yes, then a current MOU must exist prior to Yale’s submission to the NIH. No proposal can be submitted to the NIH when the faculty member has a joint appointment and an MOU is expired, requires updating, or does not exist.</td>
</tr>
</tbody>
</table>

Guide 1411 GD.01: Memorandum of Understanding Requirements: Faculty with Both a Veterans Administration Medical Center and Yale University Joint Appointment
[https://your.yale.edu/policies-procedures/guides/1411-gd01-va-memorandum-understanding-requirements](https://your.yale.edu/policies-procedures/guides/1411-gd01-va-memorandum-understanding-requirements)

Form 1411 FR.01: Memorandum of Understanding
[https://your.yale.edu/sites/default/files/1411_fr.01_memorandum_of_understanding.xls](https://your.yale.edu/sites/default/files/1411_fr.01_memorandum_of_understanding.xls)
### Patent Policy Acknowledgement and Agreement (PPAA) form completed?

If no, this form is required by Yale’s Patent Policy. Note that the NIH for example, requires the completion of such an Agreement at the time of hire must be completed prior to submission of a proposal to a sponsor.

Yale’s policy requires that all individuals named in a proposal must complete a Patent Policy Acknowledgment & Agreement form. Access to the PPAA is via the Training Management System. By completing the form the individual agrees to:

- Abide by the Yale University Patent Policy, including any amendments to it adopted from time to time, and will execute any assignments or other documents necessary to comply with its terms.
- If in the course of the research conducted under University auspices, as defined by the Patent Policy, s/he will provide to the Yale Office of Cooperative Research a written disclosure of the invention, s/he will and hereby assigns to Yale rights in that invention as provided by the Patent Policy, and s/he will cooperate with that Office in the preparation of any patent applications.
- No consulting or other agreement with any third person or organization that grants rights that are in conflict with the PPAA, nor will s/he knowingly enter into any such agreement.

Click on the following URL to complete the PPAA form online (this is a one-time requirement):

1. In the Narrow Search drop down box, select Office of Cooperative Research.
2. Click Search

Yale’s Patent Policy

[http://ocr.yale.edu/faculty/policies/yale-university-patent-policy](http://ocr.yale.edu/faculty/policies/yale-university-patent-policy)

### Is a current External Interests (COI) Disclosure on file AND that is appropriate for the sponsor to which the proposal is being submitted?

Note: This requirement also applies to any individual the PI identifies as being responsible for the design, conduct, or reporting of the research.

Yale’s Policy and Procedures

[https://your.yale.edu/research-support/conflict-interest/coi-policies-procedures](https://your.yale.edu/research-support/conflict-interest/coi-policies-procedures)

OSP’s Conflict of Interest Tools for Proposals

Proposal Compliance | Office of Sponsored Projects

### Determine if proposal submission requires PI registration and/or access to the sponsor’s electronic system.

NIH’s eRACommons [https://public.era.nih.gov/commons/public/](https://public.era.nih.gov/commons/public/)

NSF’s FastLane [https://www.fastlane.nsf.gov/index.jsp](https://www.fastlane.nsf.gov/index.jsp)

Proposal Central (required for certain non-federal sponsor submissions): [https://proposalcentral.altum.com/](https://proposalcentral.altum.com/)

### Arrange to meet with the department administrator/FRMS to discuss proposal submission.

### Prior to meeting, provide the department administrator/FRMS with a copy of the funding opportunity to which the PI will respond with a proposal.

### In preparation for the meeting with the Administrator, preliminarily determine budgetary needs, for example:

- Effort/salary for PI, key personnel, postdocs, graduate and undergraduate students, technicians
- Subawardees

Be mindful of travel requirements on federal awards, in particular foreign travel requirements regarding the Fly America Act and Open Skies Agreements. Do not build a budget based on airfare that is not appropriate to charge to a federal award.

[https://your.yale.edu/policies-procedures/policies/3301-travel-university-business](https://your.yale.edu/policies-procedures/policies/3301-travel-university-business)
• Consultants  
• Equipment  
• Materials and supplies  
• Travel (both foreign and domestic)  
• Patient care costs  
• Genomic Array

| The NIH has a specific policy regarding the direct charging of Genomic Arrays and the application of the F&A rate. Review the following Procedure for assistance:  
https://your.yale.edu/policies-procedures/procedures/1301-pr04-applying-facilities-and-administrative-rate-genomic-array |

| If the proposal is a NIH proposal, will it be a modular submission?  
Modular proposal submissions are required on new, competing continuation, and revised (amended) applications, as well as for competing supplements that request up to a total of $250,000 Direct Costs (Less Consortium F&A) and fall into one of the following mechanisms:  
• Research Project Grants (R01)  
• Small Grants (R03)  
• Academic Research Enhancement Award (AREA) Grants (R15)  
• Exploratory/Developmental Research Grants (R21)  
• Clinical Trial Planning Grant Program (R34)  
• Some RFA/PAs  
For additional information, please visit:  
https://grants.nih.gov/grants/funding/modular/modular_features.htm |

| Does the FOA indicate restrictive language that may not comport with Yale policies? For example:  
• Restrictions on the right to publish the research  
• Restrictions on the type of research being conducted, i.e., research designated as classified or of a sensitive nature  
• Restrictions concerning who at the University can be active in the research (exclusions of some foreign nationals).  
• Onerous intellectual property clauses (assignment of IP, royalty sharing),  
• Onerous and/or overly broad indemnification obligations  
• Law and jurisdiction terms that are not generally acceptable  
• Onerous confidentiality terms, which might restrict publication and/or cause unnecessary risk.  
If the funding opportunity indicates potential award restrictions that may prevent Yale from accepting the award, contact OSP prior to the preparation of the proposal. |

| Does the funding announcement include any unusual requirements such as information security requirements, approvals of human/animal subjects at proposal submission, etc.  
Discuss with OSP to ensure Yale can comply and that sufficient time exists to fulfill the potential sponsor’s expectations. If not, OSP may have to discuss with sponsor. |

| Administrator |

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<tr>
<th>✔</th>
<th>Action Item</th>
<th>Relevant Policies/Websites/Forms/Email Addresses/Instructions</th>
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</table>
| Ensure that the PI is eligible to be a PI and that appropriate approvals are in place.  
In order for a faculty member to be a principal investigator (co-principal investigator or program director), the individual must:  
• be a full-time employee of the University;  
• hold the academic rank of professor, associate professor, assistant professor, senior research scientist/scholar, or research scientist/scholar; and  
• have the requisite training, skill, commitment and expertise.  
Exceptions to the above eligibility requirements require the approval of the provost, or where appropriate, the dean of self-support units. Exceptions may |
be made for but are not limited to: associate research scientist/scholar, lecturers, instructors, emeritus faculty and other non full-time appointments.

Review/complete the following:
- Policy 1310: Principal Investigator Eligibility Requirements on Sponsored Projects
  https://your.yale.edu/policies-procedures/policies/1310-principal-investigator-eligibility-requirements-sponsored-projects
- Form 1310 FR.04: Instructions PI Status Request
  https://your.yale.edu/sites/default/files/1310fr04-pi-instruction-form.pdf
- Faculty Handbook
  http://provost.yale.edu/faculty-handbook

Read the funding opportunity sent by the PI and identify concerns requiring prior approval. Make a list of issues/concerns identified when reviewing the funding opportunity to discuss with PI.

Determine if the proposal/research will:
- • Be submitted electronically system to system OR non-system to system
Ensure that access to systems (sponsor and Yale) for those involved in the preparation of the proposal is obtained. Contact OSP for assistance.

Determine if the proposal/research will:
- • **Require** cost sharing
Policy 1306: Cost Sharing
  https://your.yale.edu/policies-procedures/policies/1306-cost-sharing-sponsored-projects
Procedure 1306PR.01
  https://your.yale.edu/policies-procedures/procedures/1306-pr01-cost-sharing
Form 1306 FR.01: Cost Sharing Approval Request Form
  https://your.yale.edu/sites/default/files/1306_fr.01cost_sharing_form.xlsx
  Cost Sharing Approval Request Form Instructions
  https://your.yale.edu/sites/default/files/1306_fr.01_cost_sharing_instruction_form.pdf

If the faculty member has a 9 month appointment, discuss if they will be participating in the “9 Over 9” program.
Salary from Grant Funds
http://provost.yale.edu/policies/salary-grant-funds-9-over-9-plan

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<th>PI and Administrator: Proposal Strategy Meeting</th>
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<tr>
<td>✔ Action Item</td>
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<tr>
<td>Relevant Policies/Websites/Forms/Email Addresses/Instructions</td>
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<tr>
<td>Discuss the funding opportunity and the expectations/requirements of the sponsor, such as:</td>
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<tr>
<td>– Due date</td>
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<tr>
<td>In planning for the submission of the proposal ensure sufficient time to secure any necessary approvals (e.g., cost sharing) and review/approval of OSP taking into account corrections that may need to occur including system issues.</td>
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</table>

Discuss the funding opportunity and the expectations/requirements of the sponsor, such as:
- Cost sharing
Prior to proposal submission, the source of funding for all cost sharing, i.e., mandatory (required by the sponsor) or voluntary committed (not required by the sponsor but committed within the proposal by the PI) or required in-kind matching must be approved by the appropriate University official (self-support school dean or cognizant provost) who has authority over the source of funds that will be used to share the cost of performing work under a sponsored research agreement. Evidence of the approval must accompany the proposal when submitted to the Office of Sponsored Projects (OSP).
Approval for voluntary committed cost sharing in the form of sharing the cost of salary support (effort) must be secured prior to the preparation of the budget and budget justification. The signature of the department chair on a proposal transmittal sheet for a proposal indicates that he or she also has approved any voluntary commitment to cost share effort. The requirement for receiving a prior approval does not apply to salary over a sponsor imposed salary rate cap. Review Yale’s Cost Sharing on Sponsored Projects policy for additional information.

Policy 1306: Cost Sharing
https://your.yale.edu/policies-procedures/policies/1306-cost-sharing-sponsored-projects

Procedure 1306PR.01
https://your.yale.edu/policies-procedures/procedures/1306-pr01-cost-sharing

Form 1306 FR.01: Cost Sharing Approval Request Form
https://your.yale.edu/sites/default/files/1306_fr.01_cost_sharing_form.xlsx

Cost Sharing Approval Request Form Instructions
https://your.yale.edu/sites/default/files/1306_fr.01_cost_sharing_instruction_form.pdf

NSF Cost Sharing Policy
Cost Sharing (Line M on the Proposal Budget)

The National Science Board issued a report entitled “Investing in the Future: NSF Cost Sharing Policies for a Robust Federal Research Enterprise” (NSB 09-20, August 3, 2009), which contained eight recommendations for NSF regarding cost sharing. In implementation of the Board’s recommendation, NSF’s revised guidance is as follows:

Voluntary Committed Cost Sharing

Inclusion of voluntary committed cost sharing is prohibited and Line M on the proposal budget will not be available for use by the proposer. In order for NSF, and its reviewers, to assess the scope of a proposed project, all organizational resources necessary for, and available to a project, must be described in the Facilities, Equipment, and Other Resources section of the proposal (see GPG Chapter II.C.2.i for further information). NSF Program Officers may not impose or encourage cost sharing unless such requirements are explicitly included in the program solicitation.

Mandatory Cost Sharing

Mandatory cost sharing will only be required for NSF programs when explicitly authorized by the NSF Director, the National Science Board, or legislation. A listing of programs that contain mandatory cost sharing is available on the NSF website at: http://www.nsf.gov/bfa/dias/policy/. In those rare instances, cost sharing requirements will be clearly identified in the solicitation and must be included on Line M of the proposed budget. Such cost sharing will be an eligibility, rather than a review criterion. Proposers are advised not to exceed the mandatory cost sharing level or amount specified in the solicitation.

When mandatory cost sharing is included on Line M, and accepted by the Foundation, the commitment of funds becomes legally binding and is subject to audit. When applicable, the estimated value of any in-kind contributions also should be included on Line M. An explanation of the source, nature, amount and availability of any proposed cost sharing must be provided in the budget justification. It should be noted that contributions derived from other Federal funds or counted as cost sharing toward projects of another Federal

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| Discuss the funding opportunity and the expectations/requirements of the sponsor, such as: | Policy 1316 Effort Commitment: Managing Effort Associated with Sponsored Projects  
https://your.yale.edu/policies-procedures/policies/1316-effort-commitment-managing-effort-associated-sponsored-projects  
Procedure 1315 PR.03: Salaries Above A Sponsor Imposed Rate Cap  
https://your.yale.edu/policies-procedures/procedures/1315-pr03-salaries-above-sponsor-imposed-rate-cap  
Guide 1316 GD.01: Effort Percent Calendar Month Conversion Table  
https://your.yale.edu/sites/default/files/1316-gd01.pdf  

Academic Year Effort  
If a faculty member has an academic appointment and is not part of the 9 over 9 program and requests summer salary only, if appropriate, the following statement can be inserted in the budget justification page, “Yale fully supports the salary of its faculty holding a 9-month appointment which they may use for research, instruction and administrative purposes. In accordance with these responsibilities, however, Yale makes no specific commitment of time or salary to this particular sponsored project during the academic year. This voluntary effort during the academic year is determined by the principal investigator and is not monitored by the University.”  

Note: Special requirements may exist for NIH career awards (including K’s and K99/R00) as well as other sponsor specific programs both non-federal and federal. For example, the NSF limits salary compensation for senior project personnel to no more than two months received from all NSF-funded grants.  

Discuss the funding opportunity and the expectations/requirements of the sponsor, such as:  
– Salary limitations  

Procedure 1315 PR.03: Salaries Above A Sponsor Imposed Rate Cap  
https://your.yale.edu/policies-procedures/procedures/1315-pr03-salaries-above-sponsor-imposed-rate-cap  

Note: Some NIH career awards have additional salary limitations.  

Discuss the funding opportunity and the expectations/requirements of the sponsor, such as:  
– F&A rate limitations  

If sponsor does not provide Yale’s full F&A costs for the type of work being proposed and has a published policy stating so, a Cost Sharing form is not required. However, if the PI is seeking a reduction or waiver of F&A costs, prior approval must be obtained and Cost Sharing Request form must be completed and submitted with the proposal. Remember: Cost sharing is highly discouraged so any cost sharing requests must be justified.  

Discuss the funding opportunity and the expectations/requirements of the sponsor, such as:  
– Restrictions on certain costs  

Some sponsors or funding announcements may indicate that certain costs will not be supported. For example, PI salary, equipment, travel, and F&A reimbursement.  

Discuss the funding opportunity and the expectations/requirements of the sponsor, such as:  
– Budget threshold  

Some opportunities may have a limit as to what the sponsor is willing to provide. Check the funding opportunity and determine if the work can reasonably be accomplished.  

In addition, if submitting a proposal to the NIH that has a budget that is greater than or equal to $500,000 in direct costs in any one year, prior approval from the NIH must be received before submitting the proposal. Contact OSP for assistance. |
Note: The NIH has a Policy on the Acceptance for Review of Unsolicited Applications that request $500,000 or more in direct costs. Specifically, applicants must seek agreement from IC staff at least six weeks prior to the anticipated submission of any application requesting $500,000 or more in direct costs for any year. Note for the purposes of determining whether or not this policy applies, this limit now excludes any consortium F&A costs. If the proposed budget excluding consortium F&A costs equals or exceeds the $500,000 level, then prior NIH approval is required. If NIH staff is contacted less than six weeks before submission, there may be insufficient time to make a determination about assignment prior to the intended submission date. If the requested dollars are significantly greater than $500,000, then NIH approval should be sought even earlier.

This prior acceptance policy does not apply to applications submitted in response to RFAs or in response to other Announcements that include specific budgetary limits. Such applications must be responsive to any budgetary limits specified; however, any specified budgetary limit now excludes consortium F&A costs.


Discuss the funding opportunity and the expectations/requirements of the sponsor, such as:

- Developing reasonable and appropriate budgets:

  - Effort

An applicant’s budget request is reviewed for compliance with Yale’s policies and procedures as well as the sponsor’s requirements and Yale’s governing cost principles (2CFR Part 220, OMB Circular A-21) and other requirements and policies applicable to the type of award. Any resulting award will include a budget that is consistent with these requirements.

To begin, all budgeted costs must conform to the principles of allowability. The cost must be:

- reasonable and necessary
- allocable to sponsored projects under the principles and methods provided in 2 CFR Part 220
- given consistent treatment; and
- conform to any limits or exclusions set forth in 2 CFR Part 220 or the terms and conditions of the award

The best strategy is to request a reasonable amount of money to do the work, not more and not less because:

- Reviewers look for reasonable costs and will judge whether the budget request is justified by the aims and methods.
- Reviewers will consider the person months listed for each of the senior/key personnel and will judge whether the figures are in sync with reviewer expectations, based on the research proposed.
- Significant over- or under-estimating suggests the PI may not understand the scope of the work.
- Despite popular myth, proposing a cost-sharing (matching) arrangement where you only request that NIH support some of the funding while your organization funds the remainder does not normally impact the evaluation of your proposal. Only a few select programs require cost sharing, and these programs will address cost sharing in the FOA.

http://grants.nih.gov/grants/developing_budget.htm

- Discuss the effort needed for proposed personnel including the PI and determine if the proposed effort is reasonable considering other awards and activities of the personnel.
If including personnel such as faculty from another department, the administrator needs to discuss the potential commitments with the business office prior to initiating the PD route or obtaining TranSum signatures.

All personnel dedicating effort to the project should be listed on the personnel budget with their base salary and effort, even if they are not requesting salary support. If not requesting salary, then the appropriate cost sharing approval must exist and be documented using the Cost Sharing form.

- **Effort:** Effort is commonly represented in person months. For assistance in converting percent effort to person months, visit: [http://policy.yale.edu/guides/1316-gd01-effort-percentcalendar-month-conversion-tables](http://policy.yale.edu/guides/1316-gd01-effort-percentcalendar-month-conversion-tables)

- **Policy 1316:** Effort Commitment: Managing Effort Associated with Sponsored Projects is located at: [http://policy.yale.edu/policy/1316-effort-commitment-managing-effort-associated-sponsored-projects](http://policy.yale.edu/policy/1316-effort-commitment-managing-effort-associated-sponsored-projects)

- **Salary requested is based on the individual’s institutional base salary.** Policy 1311: Institutional Base Salary for Sponsored Projects is located at: [https://your.yale.edu/policies-procedures/policies/1311-institutional-base-salary-sponsored-projects](https://your.yale.edu/policies-procedures/policies/1311-institutional-base-salary-sponsored-projects)

If administrative/clerical support is indicated in the proposal, the inclusion of such personnel must be in accordance with University Policy and well documented. For further information review and visit:

- **Policy 1403:** Charging of Administrative or Clerical Salaries and Certain Other Expenses to Federal Funds [https://your.yale.edu/policies-procedures/policies/1403-charging-administrative-and-clerical-salaries-and-certain-other](https://your.yale.edu/policies-procedures/policies/1403-charging-administrative-and-clerical-salaries-and-certain-other)

- **Policy 1405:** Charging of Facilities and Administrative Type Expenses to Non-Federal Sponsored Projects [https://your.yale.edu/policies-procedures/policies/1405-charging-facilities-and-administrative-type-expenses-non-federal](https://your.yale.edu/policies-procedures/policies/1405-charging-facilities-and-administrative-type-expenses-non-federal)

- **Post doctoral Salary Guidelines** [http://postdocs.yale.edu/postdocs/salaries-taxes](http://postdocs.yale.edu/postdocs/salaries-taxes)

- **Fringe Benefits:** The fringe benefits rate is based on Yale’s negotiated agreement with the federal government. For the most current information visit: [https://your.yale.edu/policies-procedures/guides/controllers-office-factsheet](https://your.yale.edu/policies-procedures/guides/controllers-office-factsheet)

- **Travel:** In the budget justification, include the destination, number of people traveling and dates or duration of the stay for all anticipated travel. In the justification, it is important to clearly state how the travel is directly related to the proposed research (e.g. go to a conference to present research results, but not just for “staying current in your field”). Note: Make certain that all travel, including foreign travel, adheres to the Fly America Act or Open Skies Agreement when determining cost of airfare. To assist with travel arrangements and ensure compliance with the Fly America act, it is recommended that you use Egencia for Business: [https://www.egencia.com/pub/agent.dll?qscr=logi&&lang=en&lang=en](https://www.egencia.com/pub/agent.dll?qscr=logi&&lang=en&lang=en)
➢ Materials and Supplies (to include computing devices <$5,000)

➢ Travel costs may include lodging, meals, registration, etc. Review Yale’s travel policies, forms, and guidance for assistance:
   https://your.yale.edu/policies-procedures/policies

➢ Equipment is defined as an item of property that has an acquisition cost of $5,000 or more and an expected service life of more than one year. Tips:

   ○ Generally, equipment is excluded from the F&A base. An item with a short service life (< 1 year), even if it costs more than $5,000 is a supply.
   ○ If equipment that is already available (listed in the Facilities & Other Resources section, for example), the narrative justification must explain why the current equipment is insufficient to accomplish the proposed research and how the new equipment’s use will be allocated specifically to the proposed research. Otherwise, the sponsor may disallow this cost.
   ○ General purpose equipment, such as desktop computers and laptops, that will be used on multiple projects or for personal use should not be listed as a direct cost but should come out of the F&A costs, unless primarily or exclusively used in the actual conduct of the proposed scientific research.
   ○ While the application does not require the inclusion of a price quote for new equipment, including price quotes in the budget justification can aid in the evaluation of the equipment cost to support the project.

➢ Identify all materials/supplies necessary to conduct the project and the estimated cost. Office supplies are generally not allowable on federal awards. A detailed budget justification for these expenses should be included for direct charging approval. Please review Policy 1403 Charging of Administrative or Clerical Salaries and Certain Other Expenses to Federal Funds for assistance:
   http://policy.yale.edu/policy/1403-charging-administrative-and-clerical-salaries-and-certain-other-expenses-federal-funds

Note: Computing devices costing less than $5,000 and having a useful life at least 1 year are allowable as a direct charge. The device does not need to be solely/primarily/exclusively dedicated (unless otherwise stated by the sponsor) to the performance of the award but must be essential to the project and allocable.

   ○ Computing devices meeting the above criteria are not equipment and should budgeted as “Materials and Supplies”

➢ Subrecipients

➢ If a portion of the proposed project will require the involvement of a subrecipient organization, the PI from that organization must prepare a budget, budget justification, scope of work, and provide a copy of that organization’s F&A rate agreement. In addition, the authorized official of the subrecipient organization must complete a Subrecipient Information Compliance form. Note: If the subrecipient anticipates using animal/human subjects in the proposed research, evidence of approval is necessary at JIT for NIH awards or at the time of issuing the subaward (unless otherwise indicated by the sponsor).
| **Stipends and Tuition Remission** | If a portion of the proposed project will require the involvement of a Consultant/Independent Contractor/Consulting Firm, the PI from that organization must prepare a budget, scope of work, and a cover letter supporting their involvement in the proposed work. |
| **Animal charges** | Some sponsors and award types permit the inclusion of graduate student stipends and tuition remission. For information regarding graduate student stipends visit: [http://www.yale.edu/graduateschool/financial/stipend.html](http://www.yale.edu/graduateschool/financial/stipend.html) |
| **Human subjects participation payments** | In addition review Policy 1315 Effort Reporting: Certifying Effort on Sponsored Awards, Section 1315.02 [http://policy.yale.edu/policy/1315-effort-reporting-certifying-effort-sponsored-projects_0](http://policy.yale.edu/policy/1315-effort-reporting-certifying-effort-sponsored-projects_0) |
| **Recruiting costs** | If animals are being used in the proposed research the cost of purchasing the animals, per diem to house the animals, as well as any special services are appropriate to budget. For a list of per diem rates and other useful information visit: [http://medicine.yale.edu/yarc](http://medicine.yale.edu/yarc) |

**Discuss the funding opportunity and the expectations/requirements of the sponsor, such as:**

- Components of the proposal, page limitations, font size, etc.

  The funding opportunity should explicitly identify those elements of the proposal that must be submitted.

**Discuss the funding opportunity and the expectations/requirements of the sponsor, such as:**

- Program Income

  Program income is income generated by the activity conducted under a sponsored award. For example, registration fees under a conference grant are considered program income. Awards generating program income will instruct how the income is to be treated. For the NIH, the default is that the income is added to the overall award unless otherwise stated in the award document. For more information, please review Policy 1308 Program Income Associated with Sponsored Awards [http://policy.yale.edu/policy/1308-program-income-associated-sponsored-projects](http://policy.yale.edu/policy/1308-program-income-associated-sponsored-projects)

**Discuss the funding opportunity and the expectations/requirements of the sponsor, such as:**

- Responsible Conduct of Research (RCR) Plan and/or mentoring plan

  RCR Plans are a requirement of some Federal sponsors. NSF for example, requires a mentoring plan for postdoctoral appointees. The NSF PAPPG, states, "Postdoctoral Researcher Mentoring Plan. Each proposal that requests funding to support postdoctoral researchers must include, as a supplementary document, a description of the mentoring activities that will be provided for such individuals. If a Postdoctoral Researcher Mentoring Plan is required, FastLane will not permit submission of a proposal if the Plan is missing. In no more than one page, the mentoring plan must describe the mentoring that will be provided to all postdoctoral researchers supported by the project, irrespective of whether they reside at the submitting organization, any subawardee organization, or at any organization participating in a simultaneously submitted collaborative project. Proposers are advised that the mentoring plan may not be used to circumvent the 15-page project description limitation. See NSF’s GPG Chapter II.D.4 for additional information on collaborative proposals. Mentoring activities provided to postdoctoral researchers supported on the project will be evaluated under the Broader Impacts review criterion."
Examples of mentoring activities include, but are not limited to: career counseling; training in preparation of grant proposals, publications and presentations; guidance on ways to improve teaching and mentoring skills; guidance on how to effectively collaborate with researchers from diverse backgrounds and disciplinary areas; and training in responsible professional practices.

Discuss the funding opportunity and the expectations/requirements of the sponsor, such as:

- **Data Security Plan**
  The cost of implementing a sponsor required data security plan should be an allowable expense and built into the budget as a direct charge unless otherwise stated in the funding opportunity.

- **Data and Safety Monitoring Plan**

Data Security Plan assistance:
Faculty who need assistance with information technology topics, including understanding their information technology needs and budgeting for those, can reach out to ITS at [research.services@yale.edu](mailto:research.services@yale.edu). ITS' Research Technology team will respond to FAS Faculty, and ITS' Medicine and IT Partners team will respond to other faculty. There is no charge for this assistance.

Depending on the nature of the research, a data/information security plan may be necessary. The need for a plan may exist if, for example, the PI:

- Will receive confidential data from the sponsor to conduct the research
- Will have access to sponsor computers and information systems
- Will have access to sponsor data
- Is required by the sponsor to provide a data security plan
- Will need to protect personal privacy and/or proprietary information
- Will need to comply with Information security requirements stipulated by the organizations (Federal, State or local to the institution) involved in the research.

Complying with these requirements can be costly and should be included as part of the budget to the sponsor. For assistance in determining whether or not research described in the proposal and/or the funding opportunity announcement includes requirements such as HIPAA, FISMA, FERPA, Add Health, or Privacy Act contact the Office of Sponsored Projects (OSP) for assistance and/or ITS' IT Compliance team ([it.compliance@yale.edu](mailto:it.compliance@yale.edu)) to assist with the budget requirements necessary to comply with the sponsor’s data security requirements if the proposal is awarded.

To help staff prepare proposals with information security requirements, OSP asks Principal Investigators to identify, on the Regulatory or Transmittal Summary form, whether or not a data security requirement is identified in the funding opportunity announcement.

**For assistance:**
- OSP proposal-related questions: [https://your.yale.edu/research-support/office-sponsored-projects/contact-us/osp-staff-directory](https://your.yale.edu/research-support/office-sponsored-projects/contact-us/osp-staff-directory)
- ITS Information Assurance & Compliance including HIPAA 'Security': [security@yale.edu](mailto:security@yale.edu) [http://security.yale.edu/contact.html](http://security.yale.edu/contact.html) (H. Morrow Long or Beth Byington)
- HIPAA ‘Privacy’: [hipaa@yale.edu](mailto:hipaa@yale.edu)

**For additional information:**
- [https://your.yale.edu/policies-procedures/policies/1601-information-access-and-security](https://your.yale.edu/policies-procedures/policies/1601-information-access-and-security)
- Information about the most common legal and data security requirements stipulated by other organizations: [https://its.yale.edu/](https://its.yale.edu/)

**NIH Data and Safety Monitoring Plan**
For each NIH sponsored clinical trial, NIH requires a data and safety monitoring plan that will provide oversight and monitoring to ensure the safety of participants and the validity and integrity of the data. The level of
### Data Management/Sharing Plan

Monitoring should be commensurate with the risks and the size and complexity of the clinical trial. A detailed data and safety monitoring plan must be submitted to the applicant’s IRB and subsequently to the funding Institute or Center (IC) for approval prior to the accrual of human subjects. The reporting of Adverse Events must be reported to the IRB, the NIH funding IC, and other required entities. This policy requirement is in addition to any monitoring requirements imposed by 45 CFR Part 46.

**NSF Data Management and Sharing Plan**

Plans for data management and sharing of the products of research. Proposals must include a supplementary document of no more than two pages labeled “Data Management Plan”. This supplement should describe how the proposal will conform to NSF policy on the dissemination and sharing of research results (see AAG Chapter VI.D.4), and may include:

- the types of data, samples, physical collections, software, curriculum materials, and other materials to be produced during the project;
- the standards to be used for data and metadata format and content (where existing standards are absent or deemed inadequate, this should be documented along with any proposed solutions or remedies);
- policies for access and sharing including provisions for appropriate protection of privacy, confidentiality, security, intellectual property, or other rights or requirements;
- policies and provisions for re-use, re-distribution, and the production of derivatives; and
- plans for archiving data, samples, and other research products, and for preservation of access to them.

NSF data management requirements and plans specific to the Directorate, Office, Division, Program, or other NSF unit, relevant to a proposal are available at: [http://www.nsf.gov/bfa/dias/policy/dmp.jsp](http://www.nsf.gov/bfa/dias/policy/dmp.jsp). If guidance specific to the program is not available, then the requirements established in the PAPPG apply. Simultaneously submitted collaborative proposals and proposals that include subawards are a single unified project and should include only one supplemental combined Data Management Plan, regardless of the number of non-lead collaborative proposals or subawards included. **FastLane will not permit submission of a proposal that is missing a Data Management Plan.**

Proposals for supplementary support to an existing award are not required to include a Data Management Plan. A valid Data Management Plan may include only the statement that no detailed plan is needed, as long as the statement is accompanied by a clear justification. Proposers who feel that the plan cannot fit within the supplement limit of two pages may use part of the 15-page Project Description for additional data management information. Proposers are advised that the Data Management Plan may not be used to circumvent the 15-page Project Description limitation. The Data Management Plan will be reviewed as an integral part of the proposal, coming under Intellectual Merit or Broader Impacts or both, as appropriate for the scientific community of relevance. Ensure there is sufficient time for completion of the proposal, review, and approval for either type of submission. Regardless of the type of submission all proposals must be approved by OSP.

- Ensure that all individuals necessary to complete the proposal have appropriate system access if submitting the proposal electronically. Contact OSP for assistance.

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**Type of proposal submission**

| Paper/electronic |

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**PI identifies individuals responsible for the design, conduct or reporting of the research in order to ensure compliance with conflict of interest requirements.**

**Note:** Responsible individuals will always include the

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Yale’s Policy and Procedures

[http://coioffice.yale.edu/yale-policies-procedures](http://coioffice.yale.edu/yale-policies-procedures)
subrecipient PI and any other individual(s) the subrecipient PI identified as being responsible.

Consultants can also be considered by the PI as being responsible for the conduct, design, or reporting of the research. If such a situation exists, immediately contact OSP.

At this time the PI will identify those individuals who s/he considers to be senior key personnel and/or responsible.

Note: A person identified as senior/key does not necessarily mean they are also responsible.

PI identifies any subrecipients/consultants and provides:

- Point of contact information
- Subawardee’s PI name/Consultant name
- Subaward value/Professional Services Agreement value

PI must review (with the administrator) the answers to the questions on the TranSum or Regulatory form

It is not the responsibility of the administrator to answer the compliance related questions. Responses to these questions must come from the PI.

The TranSum is located at: https://your.yale.edu/policies-procedures/forms/1304-fr03-transmittal-summary-tran-sum-form

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<th>Administrator (Post PI meeting)</th>
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<td>Action Item</td>
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Review/complete the following:

- Policy 1310: Principal Investigator Eligibility Requirements on Sponsored Projects
  http://policy.yale.edu/policy/1310-principal-investigator-eligibility-requirements-sponsored-projects
- Form 1310 FR.04: PI Status Request Form
  http://policy.yale.edu/sites/default/files/1310_fr_04_pi_status_request.pdf
- Form 1310 FR.04: Instructions PI Status Request
  http://policy.yale.edu/sites/default/files/1310fr04-pi-instruction-form.pdf
- Faculty Handbook
<table>
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<th>Task</th>
<th>Notes</th>
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<tr>
<td>Check TMS to determine if:</td>
<td>For multiple PI grants, including those with a PI from another department, contact the Business Offices to confirm that the other PI has completed the <strong>Sponsored Projects Administration for Faculty</strong> training.</td>
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<td>- PI has completed required training in <strong>Sponsored Projects Administration for Faculty</strong></td>
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<td>Run the Case Status Report using IRES Reporting to determine if:</td>
<td>To use IRES reporting you must first have access to the system. Contact OSP for assistance.</td>
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<td>• All “responsible” personnel (including consultants if identified as responsible) identified by the PI have completed an appropriate External Interest Disclosure, is on file with the Conflict of Interest Office, and that it is not expired.</td>
<td>IRES Reporting Portal is located at: <a href="http://decisionsupport.yale.edu/iresreporting.html">http://decisionsupport.yale.edu/iresreporting.html</a></td>
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<tr>
<td>Proposals to PHS, PHS-like sponsors and NSF for which a responsible individual does not have a current External Interest Disclosure will not be submitted to the sponsor.</td>
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<tr>
<td>Check TMS to determine if individuals identified by the PI in the proposal have completed a Patent Policy Acknowledgement and Agreement (PPAA) form.</td>
<td>If someone has not completed the PPAA provide them with the following link and instructions:</td>
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<td>- Click on the following URL to complete the PPAA form online (this is a one-time requirement): <a href="http://yale.edu/training/">http://yale.edu/training/</a></td>
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<td>1. Select Office of Cooperative Research under the Narrow Search drop down menu.</td>
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<td>2. Click Search</td>
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<td>If there are individuals from other departments included in the application, contact those Business Offices to obtain confirmation that the individuals have completed the PPAA training.</td>
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<td>Yale’s Patent Policy <a href="http://ocr.yale.edu/faculty/policies/yale-university-patent-policy">http://ocr.yale.edu/faculty/policies/yale-university-patent-policy</a></td>
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<td>If the proposal is to the NIH, determine if the PI has a Yale/VA joint appointment.</td>
<td>Guide 1411 GD.01: <strong>Memorandum of Understanding Requirements: Faculty with Both a Veterans Administration Medical Center and Yale University Joint Appointment</strong></td>
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<td>- If so, does a current MOU exist? If no MOU exists or an existing MOU has expired, OSP will not approve the proposal and the proposal will not be sent to the sponsor.</td>
<td><a href="https://your.yale.edu/policies-procedures/guides/1411-gd01-va-memorandum-understanding-requirements">https://your.yale.edu/policies-procedures/guides/1411-gd01-va-memorandum-understanding-requirements</a></td>
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<td>Note: MOUs are required to be updated annually. The NIH GPS states, “The MOU must be signed by the appropriate officials of the grantee and the VAMC, and must be updated with each significant change of the investigator’s responsibilities or distribution of effort and, without a significant change, not less than annually.”</td>
<td>Form 1411 FR.01: <strong>Memorandum of Understanding</strong> <a href="https://your.yale.edu/policies-procedures/forms/1411-fr01-memorandum-understanding">https://your.yale.edu/policies-procedures/forms/1411-fr01-memorandum-understanding</a></td>
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<tr>
<td>Prepare budget and budget justifications in accordance with the expectations of the PI.</td>
<td>All F&amp;A type costs must be appropriately justified in the budget justification.</td>
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</table>
Ensure that all proposed costs are in accordance with University policy and sponsor requirements.

If a subrecipient is included in the budget:
- Provide them with the SIC
- Inquire if they can comply with COI requirements
- Contact subrecipient/consultant and inform them of the components of the subrecipient’s/consultant’s proposal scope of work, budget and justification, and completed Subrecipient Information and Compliance form.
  – Request copy of F&A Rate Agreement if OSP does not have a current Agreement on file.
- Inform the subrecipient/consultant of the date by which their proposal is required for incorporation into Yale’s proposal to the sponsor.
- Determine if the subrecipient/consultant has a compliant PHS COI policy, if appropriate. If not, provide them with the link to complete the form which must be attached to the subrecipient’s proposal. The financial disclosure would be required of all individuals with the responsibility of reporting, conducting, or designing the research.
- Determine if the subrecipient has a federally negotiated F&A rate. If not, inform the subrecipient that they are entitled to 10% MTDC F&A rate.
  - For existing subawards receiving continuation funding, the subrecipient can re-budget to collect the 10% MTDC F&A rate, if they so choose.
  - NSF requires that the subrecipient includes 10% MTDC
  - NIH does not permit 10% F&A rates for foreign entities but 8%, excluding equipment.

If cost sharing is proposed, ensure that all approvals are in place.

Is anyone on the proposal budget with salary supported from Confidential Payroll thereby cost sharing their effort?

Ask the individual if the % effort is within the research effort limitations of their appointment letter.

Send a current and accurate copy of the individual’s current and pending support to OSP along with the proposal for review.

Review sponsors requirements for page limitations and font size

OSP does not perform these functions.

Ensure that all elements of the proposal are complete and in accordance with the requirements of the

Please be sure to include an appropriate detailed justification of F&A costs.
<table>
<thead>
<tr>
<th>sponsor. Most proposals will include the following elements:</th>
<th>Add a draft letter of intent to the Internal Documents tab is required at time of submission (template on OSP website) for OSP signature. OSP will provide signed endorsement letter if there is not a place to sign on the application.</th>
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<tbody>
<tr>
<td>• Cover page &lt;br&gt;• Abstract &lt;br&gt;• Scope of work &lt;br&gt;• Budget &lt;br&gt;• Budget justification &lt;br&gt;• Bibliography &lt;br&gt;• CV/Biographical sketch &lt;br&gt;• Current and pending support &lt;br&gt;• Facilities, Equipment and Other Resources</td>
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If submitting the proposal through Proposal Development, ensure all documents are properly uploaded prior to routing. Be sure to include a copy of the RFA, even if you are submitting to a parent RFA, i.e. R01, R21 etc.

Route proposal to the PI for review, approval, and certification. It is the PIs responsibility to complete a final review of his/her proposal ensuring that all elements of the proposal and science are in accordance with their expectations. It is also the PI’s responsibility to ensure that all the regulatory questions associated with the proposal are answered appropriately and that s/he reads the certification and agrees to its content by agreeing to it.

The administrator is responsible for ensuring the administrative components associated with the proposal are complete.

<table>
<thead>
<tr>
<th>Office of Sponsored Projects Reviewer</th>
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<tr>
<td>It is the responsibility of the Office of Sponsored Projects (OSP) reviewers to understand and be well-versed in the proposal submission requirements of Yale’s sponsors, to provide assistance to the community when preparing proposals, and ensure that all proposal submissions are regulatory compliant when approving a proposal submission.</td>
</tr>
<tr>
<td>OSP will not review proposals for the following: &lt;br&gt;• All required sections/content of the proposal are complete &lt;br&gt;• PMCID (PubMed Central reference number) &lt;br&gt;• Page limitations &lt;br&gt;• Font size &lt;br&gt;• Salaries of personnel &lt;br&gt;• Sponsor specific requirements &lt;br&gt;• The PD route has not yet been received by the proposal manager or required personnel are missing from the route</td>
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<tr>
<td>Ensure that the PI is eligible to be a PI and, if necessary, the PI Status Request Form is included with all approvals.</td>
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<tr>
<td>Review the Regulatory or TranSum form to determine if the PI has a joint appointment with VACHS. If so, review the VA MOU for currency.</td>
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### By the VA MOU

**Note:** Any individual with a joint appointment and does not have a VA MOU or current VA MOU cannot submit a proposal to the NIH. OSP will not approve the proposal for submission.

https://your.yale.edu/policies-procedures/guides/1411-gd01-va-memorandum-understanding-requirements

Review Form 1411 FR.01 Memorandum of Understanding located at: https://your.yale.edu/policies-procedures/forms/1411-fr01-memorandum-understanding

### Export Controls

If any of the export control related questions are positively answered (Yes), the OSP Reviewer is required to notify the Director, Corporate Contracts and Export Controls Licensing. The Director may contact the PI for further information.

### Ensure that any cost sharing is supported by a fully completed cost sharing form indicating a PTAEO to support the proposed cost sharing.

Ensure proposal does not include embedded cost sharing within the text of the proposal.

### Review the budget for F&A type costs.

Ensure they are appropriate for inclusion in the proposal by reviewing the budget justification. Inadequate justifications will require the removal of the item from the budget prior to proposal submission.

If the justification is insufficient the PI must provide additional justification or remove the proposed cost from the budget prior to submission to the sponsor.

Policy 1403: Charging of Administrative or Clerical Salaries and Certain Other Expenses to Federal Funds  

Policy 1405: Charging of Facilities and Administrative Type Expenses to Non-Federal Sponsored Projects  

### Is anyone on the proposal budget with salary supported from Confidential Payroll thereby cost sharing their effort?

Approval from the Provost’s Office for committed cost sharing in the form of effort for individuals paid on the Executive (Confidential) Payroll is not required. However, a Cost Sharing Approval Request form must be completed and submitted to the Office of Sponsored Projects in order to facilitate the award set-up process.

Ensure that a Cost Sharing form is completed (does not require the approval of dean/provost) and that the individual is not exceeding his/her % effort that they can devote to sponsored awards by reviewing the individuals current and pending support or running a query in PT.

Contact the University Research Compliance Officer to discuss any concerns or issues question.

Procedure 1306.01: Cost Sharing  
[http://policy.yale.edu/procedure/1306-pr01-cost-sharing](http://policy.yale.edu/procedure/1306-pr01-cost-sharing)

### Review the Subrecipient Information and Compliance Form ensuring that it is adequately completed.

If the proposal is to any of the PHS agencies or PHS-like sponsors adopting the PHS COI policy, the subrecipient must have a compliant COI policy. If not, the subrecipient must have all responsible personnel complete a financial Interest disclosure with the proposal.
<table>
<thead>
<tr>
<th>Task</th>
<th>Instructions / Notes</th>
</tr>
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<tbody>
<tr>
<td><strong>Subrecipient F&amp;A Agreement and Budget Justification</strong></td>
<td>Ensure that the appropriate F&amp;A rate is used and any inflation factors in the budget for out years is reasonable. Confirm that any F&amp;A type costs included in the budget justification have been adequately justified.</td>
</tr>
<tr>
<td><strong>Review the solicitation and any required certifications for submission to ensure all terms and conditions, if agreed to at time of submission, are acceptable.</strong></td>
<td>Any proposal that contains terms and conditions that are unacceptable to the University may require an accompanying letter reserving the right to negotiate the terms at the time of the award or may delay or prohibit submission.</td>
</tr>
<tr>
<td><strong>Ensure that the proposal is regulatory compliant and that all terms, conditions and certifications required at the time of submission are acceptable to the University or that an appropriate letter is included.</strong></td>
<td>If all regulatory requirements are fulfilled, the Reviewer will approve the proposal and submit the proposal to the sponsor (with certain exceptions). Proposals that are incomplete and/or regulatory requirements not fulfilled will be returned to the PI/department.</td>
</tr>
<tr>
<td><strong>Open necessary tickets with relevant vendor and/or inform the IRES support team (if related to PD) of any system issues that arise.</strong></td>
<td>Inform the department administrator and work with the Associate Director, IRES support team and relevant vendors to open tickets and develop a plan to submit the proposal.</td>
</tr>
<tr>
<td><strong>Work with the Office of Sponsored Projects to resolve any system issues impacting the submission of the application.</strong></td>
<td>System issues may occur in Proposal Development (PD), Grants.gov, eRA Commons, FastLane or any other electronic system involved in the development and submission of the application. Resolving the issue may include, but is not limited to, keeping the Principal Investigator informed and rebuilding some or all the application.</td>
</tr>
<tr>
<td><strong>If submitting an NIH proposal, PIs should always check the final application in the NIH Commons to ensure it rendered properly and alert your OSP Proposal Manager immediately if something does not look correct.</strong></td>
<td>Principal Investigator (PI)</td>
</tr>
</tbody>
</table>