

Proposal Submission Policy and the Three Working Day Rule

Updated August 24, 2012

Due to the high volume of last minute proposal submissions to Sponsored Research Services (SRS) and the FSU Research Foundation (FSURF), it has become necessary for the Office of Research to adopt a new proposal submission deadline policy to ensure timely review and processing by SRS/FSURF. While it is highly recommended that proposals be submitted to SRS and FSURF for review several weeks before the agency deadline, “completed proposals” (see definition below) will now be required at SRS/FSURF by 9 a.m. **three working days** prior to the day of the agency deadline (see chart below). This provides the proposal administrator with adequate time to ensure that the proposal follows agency guidelines, the budget is accurate, incorporated contractual language is acceptable, time exists for necessary revisions, Chair and Dean approvals have been obtained, etc. We cannot guarantee that proposals submitted after the deadline will be approved for submission to the funding agency.

Definition of “completed proposal”: In order for the proposal to meet the 3-day rule, the following must be submitted to SRS or FSURF 3 days before the sponsor deadline, and all fields and documents except the final scope of work must be entered/uploaded into the sponsor’s website or application (if electronic submission) 3 days prior to the day of the sponsor deadline:

1. completed proposal transmittal form with signatures or completed proposal in the OMNI system with all appropriate departmental, chair, and dean approvals;
2. detailed budget;
3. detailed budget justification;
4. scope of work (fairly accurate yet rough version of the technical portion of the proposal is acceptable at this stage);
5. requests for internal approvals (i.e., request to overmatch, cost sharing commitment form) with appropriate departmental, chair, and dean approvals;
6. commitment letters from entities to whom you wish to subcontract;
7. sponsor’s RFP (a.k.a. program announcement, guidelines);
8. forms and/or application required by the sponsor; AND
- 9. proof of completion of Department of Health & Human Services financial conflict of interest requirements (i.e., training, disclosure of significant financial interests), if applicable. If subcontractors, consultants, or collaborators are designated as investigators by the PI, proof of their completion of FCOI training and disclosure is also required.**

Sponsor Deadline	SRS Internal Deadline for 3-day rule
Monday	the previous Wednesday at 9 A.M.
Tuesday	the previous Thursday at 9 A.M.
Wednesday	the previous Friday at 9 A.M.
Thursday	Monday of the same week at 9 A.M.
Friday	Tuesday of the same week at 9 A.M.
Saturday	Because Saturday is not a business day, it does not count towards the 3-day rule. You should treat Friday as the deadline, so the internal proposal deadline is Tuesday of the same week at 9 A.M.
Sunday	Because Sunday is not a business day, it does not count towards the 3-day rule. You should treat Friday as the deadline, so the internal proposal deadline is Tuesday

(Please note: The construct of the 3-day rule is necessary so that electronic submissions can be processed early enough on the actual day of the sponsor deadline; otherwise, proposal submissions are jeopardized due to slow or frozen websites. In turn, the 3-day period runs from 9 A.M. three days prior to the day of the sponsor deadline to 9 A.M. on the day of the sponsor deadline).

This policy applies to all proposals to all agencies including situations where we are not the lead institution but are receiving a subaward/subcontract from another lead institution¹. Regardless of whether a proposal is to be submitted as a hard copy or through electronic submission, all proposals must be submitted to SRS for review prior to submission to the agency. Proposals submitted without SRS/FSURF approval may be withdrawn. Proposals submitted without SRS/FSURF approval that receive funding will not be accepted by the university or the research foundation unless an exception to this policy is approved by the Vice President for Research with an adequate explanation by the PI as to why the proposal was not submitted through SRS or FSURF. Proposals require the signature of an authorized representative or official. The Vice President for Research or one of his delegates are the ONLY individuals authorized to sign agency forms, representations, certifications and other grant or contract documents requiring the signature of an authorized representative, official or signatory. All official signatures must be obtained from SRS/FSURF. Likewise, no proposal will be approved by SRS or FSURF without all required Chair and Dean approvals. **Note: Department of Health & Human Services (DHHS) defines investigator as the project director or principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of research, including collaborators or consultants. For DHHS direct-funded proposals and flow-through proposals, federal law prohibits the submission of proposals for which all of the investigators, as designated by the PI and meeting the DHHS definition of investigator, (including investigators on proposed subcontracts or agreements with collaborators, consultants, etc.) on the project have not completed financial conflict of interest training and disclosed significant financial interests.**

Many PIs wish to work on the technical portion of their proposal until the last minute. To accommodate this request, PIs may submit a fairly accurate yet rough version of the technical portion of the proposal to meet the three working day rule. In turn, a final version of the technical portion of the proposal will not be due until the day the proposal needs to be submitted, provided that no substantial changes to the scope of work are made after the rough version of the technical portion of the proposal is submitted to SRS/FSURF. FSURF or SRS as appropriate must have a file copy of the complete final proposal as submitted to the sponsor. The rest of the proposal (i.e., detailed budget, budget justification, abstract, proposal transmittal form, agency forms), however, must be submitted to SRS three working days prior to the day of the agency deadline. We encourage PIs to send proposal items piecemeal well before the three working day deadline. For example, if you have a detailed budget and budget justification (a.k.a. budget narrative) two weeks before the deadline but don't have everything else, please go ahead and send it to SRS/FSURF for review. That will help prevent last minute revisions at a later date. Please note, however, that the PI or someone authorized by the PI needs to be available after submitting the proposal (whether piecemeal or all at once) in order to promptly make corrections, provide more information, etc.

When submitting proposals that require electronic submissions through an agency's web-based system, principal investigators should be aware that some agencies' systems are commonly unstable and become overloaded or frozen due to heavy access as a deadline approaches. It is strongly recommended that an additional working day be allowed for processing of electronic proposals in order to ensure that sufficient time exists to resolve any technical issues that occur. Likewise, it is recommended that complex proposals (i.e., those with contract documents incorporated, those with multiple consortium or subcontract arrangements, those with cost sharing from third parties, those with complicated budgets) be submitted a day or two before the three working day deadline to offset the extra time needed for approvals and review. If submitting a proposal electronically, please check with SRS to confirm the proper FSU contact information to be entered into the sponsor's website. Agency specific E-mail accounts have been set up for many of the sponsors to ensure that sponsor communications reach SRS or FSURF.

In the event of the university closing (due to inclement weather or another emergency), SRS and FSURF will be closed. In this situation, faculty or grant administrators with a grant deadline during that

period of time who have not received approval from SRS for their proposal should contact the funding agency for an extension to the deadline date. For other university holidays or closings, PIs should treat the last day before the closing or holiday as the submission deadline. In other words, proposals shall be submitted to SRS three working days before the last working day before the holiday or closing.

After all official reviews are complete, it is the responsibility of the principal investigator to assure that a proposal is transmitted to the sponsor in time to meet any established deadlines with the exception of electronic submissions where SRS/FSURF actually push the submit button..

For the vast majority of PIs who submit their proposals for review early, there should be little change in procedure. We appreciate your cooperation and understanding that our proposal submission policies are necessary to give each and every proposal a proper review. In turn, our proposals will have a better chance of funding. If you have any questions about this policy or other sponsored research policies, please contact SRS or FSURF during their business hours of 8:00 a.m. – 5:00 p.m.

¹ In cases where another institution is the lead applicant, FSU's deadline is the deadline dictated to FSU by the lead institution (often a day or two prior to their actual deadline) and not necessarily the lead institution's deadline to their sponsor.