SUBMISSION AND ROUTING OF PROPOSALS FOR EXTRAMURAL FUNDING
(TULANE UNIVERSITY POLICY)

Responsible University Official: Senior Vice President for Academic Affairs and Provost
Responsible Office: Sponsored Projects Administration (“SPA”)  
Coordinating Departments: Sponsored Projects Administration, all departments participating in sponsored projects

Issued Date: July 1, 2009  Effective Date: November 1, 2012
Last Reviewed Date: November 16, 2017  Next Review Date: January 15, 2022

WHO NEEDS TO KNOW THIS POLICY: Deans, Department Chairs, and Faculty Members and Staff participating in sponsored projects.

WEBSITE ADDRESS FOR THIS POLICY: Tulane University - Research Policies and Information

I. Background
The requirement to submit proposals through Tulane University insures that proposals for sponsored projects to be conducted by university employees or with the use of university resources or facilities are approved by the university. Such approval is necessary to insure compliance with university policies and guidelines pertaining to the conduct of research.

II. Policy
A. Tulane University requires that employees submit all proposals for grant and contract funding through the appropriate university routing process.
B. Proposals may not be submitted by individuals, but must be submitted by Tulane University. The proposer is required to work with SPA or Office of Development to accomplish this. This policy acknowledges exception in the case where the sponsor requires a submission from an individual rather than from the institution.
C. Persons who are not affiliated with Tulane are not eligible to propose the use of Tulane resources or the conduct of research at Tulane unless special appointments and exceptions are granted.
D. Any exceptions to the requirement to submit proposals through the appropriate university routing process must be requested in writing and accompanied by an explanation of the circumstances for which an exception is sought. A determination will be made in consultation with the Dean, Vice President for Research, and the Provost after consideration of the request and the circumstances.

III. Proposal Submission Procedures are described in Addendum I to this policy.

IV. Related Policies and forms
A. Tulane University Faculty Handbook
B. Who Can Serve as PI and Other Eligibility Requirements
C. Acceptance of Awards and Extramural Funding
D. Proposal Routing Forms
E. Routing of Proposals to Corporations, Foundations and/or Other Organizations
Addendum I
Procedures for Submitting a Proposal for Extramural Funding

General: All proposals are reviewed by the department, school or college, and SPA before they are signed by an authorized institutional official and sent to a sponsor. This review assures conformance to University and agency policies and ensures that necessary components of the proposal have been incorporated. A PI should initiate this review process as soon as possible, but no less than seven days before a signature is needed by preparing a draft of the proposal for preliminary review by SPA. At a minimum, SPA should review administrative forms, certification pages and the budget during the draft stage to avoid making changes close to the deadline. If the sponsor has not provided specific forms, the PI should contact SPA for guidance. Failure to conform to sponsor requirements may result in the proposal being deemed ineligible.

In order to expedite the routing process, the following components of a proposal shall be routed through the regular channels for signature prior to finalization of the proposal:

a. A completed/signed Proposal Routing Form.
b. The proposed budget, budget justification, subawardee budget, if applicable, and other administrative forms required by the sponsor.
c. For clinical trials: The complete proposed Clinical Trial Contract, and copy of the protocol may be attached to the completed Proposal Routing Form and sent to SPA so they may begin the review and negotiation process. At the same time the protocol may be submitted to the IRB to begin review and approval procedures.

1. Proposal Routing Form: A Proposal Routing Form must be completed and submitted with each proposal. Used for statistical and tracking purposes by the deans and SPA, it records basic data such as the PI’s name, the title of the proposal, the funding agency, and budget information. Special requirements or commitments such as cost sharing, renovations of space, etc., are noted on this form, which is also used to track federal regulations concerning conflict of interest, animal care, and human subjects. The PI, the PI’s department chair, and the dean are required to sign the completed Proposal Routing Form. One exception is that the Proposal Routing form does not have to be signed by the School of Medicine Dean unless the project involves cost sharing. If personnel from other schools are included in the proposal, additional signatures of Chairs and Deans may be required.

2. Criteria for Routing Proposals through Sponsored Projects Administration: SPA is responsible for determining when proposals should be submitted through SPA or Tulane University Corporate and Foundation Relations. In general, the criteria for routing through SPA are:
   a. The sponsor is a federal, state or municipal entity;
   b. Award includes use of public funds for cost sharing or matching funds;
   c. Award contains provisions regarding ownership of intellectual property rights, patents and copyrights;
   d. Award includes funding to be subcontracted to a third party for a part of the scope of work;
   e. Award restricts or monitors publications or use of results;
   f. Award requires protection of sponsor and/or confidential information;
   g. Award is for a clinical trial; and/or
h. Award is for research involving the use of human subjects, vertebrate animals, radioisotopes on humans, select agents and toxins, radioactive materials, recombinant DNA, human body substances, etiologic agents or proprietary materials.

3. **PI signature requirements for PHS (NIH) proposals**: Effective for proposals submitted to NIH on May 10, 2006 and thereafter, the signature of the Principal Investigator is no longer required as a part of a submitted application. NIH requires the applicant organization to secure and retain at the organization a written assurance from the Principal Investigator (PI) prior to submitting an application to the PHS. To meet this requirement, Tulane University requires the PI to sign and date the Proposal Routing Form for each submitted application. This assurance must be available to the sponsoring agency upon request. The Proposal Routing Form contains the following certifications: (1) that the information submitted within the application is true, complete and accurate to the best of the PI’s knowledge; (2) that any false, fictitious, or fraudulent statements or claims may subject the PI to criminal, civil, or administrative penalties; and (3) that the PI agrees to accept responsibility for the scientific conduct of the project and to provide the required progress reports if a grant is awarded as a result of the application. When multiple PIs are proposed in an application, this assurance must be retained on Proposal Routing Forms for all named PIs.

4. **Conflict of Interest and Attestation to Truthfulness and Accuracy of Proposal**: In addition to the annual conflicts of interest certification required by Section III (D) of the Tulane University Faculty Handbook the Proposal Routing Form includes a statement relative to Conflict of Interest. The PI must certify the presence or absence of certain conditions on each proposal submission. PIs provide certification that they will abide by Tulane University policy on conflict of interest and that no conflict of interest exists for any key personnel involved in the project. The PI’s signature on the routing form provides assurance that the proposal contains information that is true, complete and accurate.

5. **Budget Preparation and Guidelines**
   a. A budget constitutes the cost proposal and should conform to the statement of work. It also corresponds to the proposed time frame and should be arranged in clearly defined categories, usually required by the sponsor. Budgets may be subject to the sponsor’s specific regulations about allowable costs and acceptable categories of expenditures.
   b. Budget costs fall into two broad categories: direct and indirect (called Facility and Administrative or F & A costs). Direct costs are those that can be clearly allocated to an individual project, such as salaries, supplies, equipment, etc. Indirect (F&A) costs are less easily assigned to a project but rather are shared with the entire research enterprise. Federally negotiated indirect costs rates must be used for all budgets unless specified in a published policy of the sponsor. For industry sponsored clinical trials the indirect (F&A) costs are calculated as 25% of direct costs minus the IRB fees. Waivers or reductions of indirect costs rates must be approved by the Vice President for Research and the Provost. Contact a staff member of SPA for instructions on requesting a waiver or reduction in F&A costs.

6. **Internal Deadlines for Proposal Review, Approval and/or Electronic Submission by SPA**
   a. In order for SPA to have sufficient time to review proposals for compliance with University and sponsor requirements, to assess the project for risks to Tulane as well as commitments of institutional resources (e.g. faculty effort, cost-sharing, etc.), SPA has instituted internal deadlines
for all proposal submissions. The *Chart of Internal Deadlines (Exhibit I)* contains a matrix for proposal submission; required documents for SPA review and the timeline for submission.

b. Sponsors may have proposal receipt deadlines that are not consistent with the Tulane University holiday schedule and/or the University's hours of operation. The hours of operation for SPA are 8:30 to 5:00pm, Monday through Friday. If a sponsor deadline falls on a weekend or University holiday, proposals must be submitted prior to 5:00pm on the last working day prior to the agency deadline. Working days do not include weekends or official university holidays.

c. Proposals provided to SPA outside the schedule set forth in the Chart of Internal Deadlines may be at risk in meeting the submission requirements of the sponsor.
**Chart of Internal Deadlines for Review and Approval by the Sponsored Projects Administration**

<table>
<thead>
<tr>
<th>Due in SPA</th>
<th>Grants.gov (NIH) Sections needed</th>
<th>Grants.gov (Other agencies) Sections needed</th>
<th>National Science Foundation Sections needed</th>
<th>Paper Sections needed</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>Seven working days before deadline:</td>
<td>1. Tulane Routing Form* (completed or in draft) 2. SF 424 (Research &amp; Related) Face Page 3. Modular Budget Form or “Research and Related” form (used for line item budgets) 4. Subaward Budgets, if applicable 5. Project Performance Site Location Form 6. PHS 398 Cover Page Supplement 7. Check List</td>
<td>1. Tulane Routing Form* (completed or in draft) 2. SF 424 (Research &amp; Related) Face Page 3. “Research and Related” form (used for line item budgets) 4. Subaward Budgets, if applicable 5. Project Performance Site Location 6. Other administrative or budget forms required by the sponsor</td>
<td>1. Tulane Routing Form* (completed or in draft) 2. Budget forms and budget justification 3. Current and Pending support 4. Subaward Budgets, if applicable 5. Subaward letter of commitment, if applicable 6. Other administrative or budget forms required by NSF</td>
<td>1. Tulane Routing Form* (completed or in draft) 2. Sponsor cover page, if applicable 3. Budget forms and budget justification 4. Current and pending support, if applicable 5. Subaward budgets, if applicable 6. Subaward letter of commitment, if applicable 7. Other administrative (i.e., assurances, certifications, etc.)</td>
<td>For special submission requirements contact SPA for guidance</td>
</tr>
</tbody>
</table>


*Note that SPA staff do not require completed, signed routing forms prior to assisting faculty with draft budgets.*