

**NOVA SOUTHEASTERN UNIVERSITY
OFFICE OF SPONSORED PROGRAMS
POLICIES AND PROCEDURES**

**PROPOSAL PREPARATION
ELECTRONIC RESEARCH ADMINISTRATION
EFFECTIVE 12-01-08, REVISED 12-26-2014
POLICY #10
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PURPOSE:

To establish a policy and procedures to assist the university community in completing all electronic research administration tasks related to their pre-applications, applications and awards.

DEFINITIONS:

Electronic Research Administration (eRA): The initiative to move from paper to a fully/partially electronic research administration environment. The eRA initiative sets up an electronic dialogue between sponsoring agencies and grantee organizations, either directly and/or indirectly. This dialogue can include, but is not limited to, pre-applications, applications, reports, and award management documents.

POLICY:

If electronic submission of pre-application, application or post-award documents is required by the sponsoring agency, the Principal Investigator/Project Director (PI/PD) must work with the Office of Sponsored Programs (OSP) to prepare and submit the materials in the format and manner required by the sponsoring agency, following established pre-award and post-award policies and procedures.

REFERENCES:

- OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR Part 200, <https://federalregister.gov/a/2013-30465>
- OMB Federal Awarding Agency Regulatory Implementation of Office of Management and Budget's Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, <https://www.federalregister.gov/articles/2014/12/19/2014-28697/federal-awarding-agency-regulatory-implementation-of-office-of-management-and-budgets-uniform>
- NIH Grants Policy Statement, <http://grants.nih.gov/grants/policy/policy.htm#gps>
- NSF Proposal and Award Policies and Procedures Guide, <http://www.nsf.gov/bfa/dias/policy/>
- HHS Grants Policy Statement, <http://www.hhs.gov/grants/grants/policies-regulations/index.html>

PRE-AWARD PROCEDURES:

All procedures regarding the preparation of pre-applications and applications listed in OSP Policy Nos. 3 through 7 must be followed. In addition, the following procedures are in effect for all pre-applications and applications requiring partial and/or complete submissions electronically.

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1. The Principal Investigator/Project Director (PI/PD) must contact OSP to ensure that NSU is registered with the applicable eRA system. If NSU is not already registered, OSP staff will ensure that the university is registered prior to the electronic submission deadline. Federal eRA systems include, but are not limited to:
 - Grants.gov (federal agency gateway)
 - G5 (Department of Education)
 - eRA Commons (NIH)
 - FastLane (NSF)
 - Electronic Biomedical Research Application Portal (USAMRMC, USAMRAA, CDMRP, DHP)
 - Grants Management System (Department of Justice)
 - Grants Online (NOAA)
 - NSPIRES (NASA)
2. The PI/PD must work with the OSP to ensure that he/she is registered within the applicable eRA system, if required by the sponsoring agency and/or eRA submission system (i.e., Fastlane, eRA Commons).
3. The PI/PD should complete all pre-application and/or application materials (e.g., project narrative, bio-sketches, budget justification, etc.) electronically and transmit them via email to the OSP.
4. The OSP will upload all application materials into the applicable eRA system. Once the pre-application and/or application are completed, the OSP Director, as the university's Authorizing Official, will submit the proposal on behalf of NSU.
5. If the eRA system allows the PI/PD to submit information electronically, the PI must first obtain written delegation of authority from the OSP. Please note that the PI/PD is not permitted to submit without first routing the necessary documentation through normal channels to obtain the NSU required written approvals. Once all NSU necessary written approvals are obtained, the PI/PD may then submit information electronically. Failure to obtain the necessary approvals may result in the university failing to accept an award, if an award is made by the sponsoring agency.
6. If an error occurs during the uploading/submission process, or if the proposal is rejected by the eRA system or sponsoring agency, the OSP will work with the PI/PD to research, resolve the issue, and resubmit in accordance with sponsor policies. Because the PI/PD's assistance may be required during this step, he/she is encouraged to remain in close contact with the OSP following electronic submission.
7. Most eRA systems send error messages, warning messages and confirming receipt messages to both the PI/PD and the institutional authorized official. If the PI/PD or his/her College/Center/department

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does not receive these messages, the PI/PD or his/her College/Center must contact the OSP to obtain copies of these messages.

8. If a sponsoring agency and/or eRA system requires additional documentation (electronic or paper), the OSP will coordinate with the PI/PD and his/her College or Center to ensure submission of the necessary document(s) to the sponsoring agency and/or eRA system (for example, just-in-time information).

POST-AWARD PROCEDURES:

In addition to the procedures regarding award maintenance outlined elsewhere in these policies, the following procedures are in effect for all post-award submissions that are to be submitted electronically. OSP maintains an official award file and all required post-award documentation, whether submitted electronically or in hardcopy, must be maintained in that file (refer to OSP Policy No. 26 – *Official Award File and Records Retention*)

1. The PI/PD must work with the OSP to determine what, if any, eRA procedures apply to their award. . The PI/PD and OSP will collectively determine if the post-award submission should be initiated by the PI, OSP and/or Contract and Grant Accounting Department (CGA). Regardless of whose primary responsibility pertains to the submission, such documents must be routed through the OSP, (excluding financial reports invoices, etc. which are submitted directly by CGA working with the PI/PD, and retained in CGA's official records for audit purposes) and a copy placed in OSP's official award file.
2. If primary responsibility lies with the PI/PD (progress reports, technical reports, patent disclosure, etc.), the PI/PD will prepare the document and route through normal university review and approval processes as applicable. If the sponsoring agency and/or eRA system allows the PI/PD to submit independent of the university authorized official, such submission cannot occur until required approvals are obtained, and the PI/PD must provide a copy to the OSP for inclusion into the OSP's official award file. If the sponsoring agency and/or eRA system requires submission by the university authorized official, the OSP will submit and maintain a copy of the submission in the OSP's official award file.
3. If primary responsibility lies with CGA (financial reports, invoices, LOC, etc.), the OSP will communicate the post-award eRA requirements for which CGA is responsible through the Project Digest (the document developed and distributed at award set-up by the OSP that includes a summary of award information, award documents, administrative requirements, and a budget with university expense account codes). A copy of any final invoice/financial reports submitted by the CGA via eRA systems will be forwarded by the CGA to the OSP for inclusion within the OSP's official award file.