
2102 APPROVAL OF PROPOSALS

EFFECTIVE: DEC. 1986
REVISED: APRIL 2018
REVIEWED: APRIL 2018
RESPONSIBLE OFFICE: RESEARCH SERVICES
APPROVAL: RESEARCH SERVICES

PURPOSE

To ensure that proposals submitted for external support of research and other sponsored projects comply with University financial and other policies.

POLICY

1. All proposal submissions seeking external support for research and other sponsored projects, regardless of mode of submission to the sponsor, must be submitted to the responsible office for review and approval prior to submission to an external sponsor. A completed Principal Investigator Certification form and Proposal Transmittal and Approval Form, signed/certified by the Principal Investigator/Project Director and the Business Administrator or other individual responsible for proposal preparation and project administration must accompany the proposal. All new and/or competing submissions must have a completed PennERA Proposal Development record containing a completed electronic "Certification by Principal Investigator" form electronically signed/certified by the Principal Investigator/Project Director and an electronic "Proposal Transmittal Form" completed by the Business Administrator or other individual administratively responsible for proposal preparation and sponsored project administration. Preliminary discussions of projects, including research plans, budgets and other terms may occur in advance of approval by the responsible office so long as no binding commitments are made.
2. All proposals should be approved by the responsible department chairperson. When a project involves members of more than one department, all responsible chairpersons should approve the proposal. Chair level approval is NOT documented in PennERA, and may be confirmed by post-submission review.
3. All proposals must be approved by the appropriate dean/resource center director. When a project involves members of more than one school/center, the approval of all responsible deans/directors is required.
4. The Principal Investigator accepts responsibility for the scientific and technical conduct of the project and for provision of required technical reports if a grant or contract is awarded as a result of the application. The Principal Investigator attests that (a) all related significant financial interests

have been disclosed, and (b) Participation Agreements have been signed by all personnel proposed to work on the project.

5. The Business Administrator attests to the completeness and accuracy of the budgetary and administrative information contained in the application.
6. The department chairperson confirms the academic purposes of the proposed project, its departmental compatibility, and its appropriateness in terms of budget, space and equipment.
7. The dean/resource center director attests to (a) the appropriateness and availability of personnel, including salary levels, (b) the adequacy of space and other facilities needed for the project, and (c) the budget and Facilities and Administrative (F&A) cost recovery. A dean/resource center director may approve less than full recovery of F&A costs in accordance with Sponsored Projects Policy No. 2116, Facilities and Administrative (F&A) Costs.
8. Research Services, the Penn Center for Innovation and the Office of Clinical Research ensure that proposals comply with University and sponsor policies, that proposals are complete and that all signatures/certifications and approvals, including those of appropriate regulatory offices, have been obtained. Research Services, the Penn Center for Innovation and the Office of Clinical Research are solely authorized to sign proposals on behalf of the Trustees of the University of Pennsylvania.
9. Proposals, that raise policy issues, may be referred to the Vice Provost for Research for review and approval prior to submission to the sponsor. Proposed projects which do not appear to conform to the Guidelines for the Conduct of Sponsored Research (see Sponsored Programs Handbook) may be referred to the Vice Provost for Research for review and approval prior to making any commitments, either formal or informal.
10. Proposals, which raise intellectual property issues, may be referred to the Penn Center for Innovation for review.
11. The University reserves the right to withdraw any proposal that does not comply with this policy.

RELATED INFORMATION:

SPP 2116 Facilities and Administrative Costs

ROLES AND RESPONSIBILITIES:

PRINCIPAL INVESTIGATOR

- Appropriately route the project for internal review and approval
- Accepts responsibility for content of proposals and administering any resulting award

BUSINESS ADMINISTRATOR

- **Appropriately route the project for review and approval**
- **Accepts responsibility for the completeness and accuracy of the budget**

DEAN

- **Agrees the proposed project and the corresponding budget is acceptable to the School**

PENN CENTER FOR INNOVATION

- **Authorizes the submission of the proposal for corporate sponsored research on behalf of the Trustees of the University of Pennsylvania**
- **Ensures that the proposal complies with University and Sponsor policies**

OFFICE OF CLINICAL RESEARCH

- **Authorizes the submission of the proposal for an industry sponsored clinical trial or industry sponsored research involving the participation of human subjects on behalf of the Trustees of the University of Pennsylvania**
- **Ensures that the proposal complies with University and Sponsor policies**

OFFICE OF RESEARCH SERVICES

- **Authorizes the submission of the proposal for federally funded or nonprofit foundation funded research on behalf of the Trustees of the University of Pennsylvania**
- **Ensures that the proposal complies with University and Sponsor policies**

The source of this document is Research Services.