UNM MAIN CAMPUS

August 7, 2015

To: Deans, Directors, Chairs, Faculty and Staff

From: Michael Dougher, Vice President for Research

Subject: Update on Proposal Submission Guidelines

First, thanks for your feedback on the draft modifications to the Proposal Submission Guidelines that were distributed in May. As is to be expected when changes are proposed, we received lots of comments from across campus. From your comments, it was clear that the lack of a detailed justification as a preamble to the suggested changes made them appear arbitrary and abrupt. In addition, many respondents expressed concern that the changes would introduce new impediments to research at UNM. As this was exactly the opposite of our intent, let me take this opportunity to present a broader context within which to consider the new policy.

*The Process*

The proposed changes outlined in the previous draft were the result of several open, detailed and, sometimes, intense discussions that occurred last spring in several meetings of the VPR advisory committee. This committee consists of the Associate Deans for Research from each main campus college, the Directors of the three Category 3 research centers, representatives from the Faculty Senate Research Committees, and representatives of the OVPR. These discussions began in an attempt to address some growing problems identified by the Office of Sponsored Projects (OSP, or “Pre-Award”) that are both costly to the University’s research mission and put the University at considerable risk of noncompliance with both federal and state guidelines. We did not enter these discussions with a set of predetermined solutions and, in fact, several of the proposed changes were suggested by members of the advisory committee. While we in the OVPR assumed that the gist of these discussions had made their way to the faculty and research staff, your comments clearly indicated that assumption was mistaken. Final suggestions were probably made too late in the semester for that to happen, hence, the appearance that they were arbitrary and abrupt.

*Evaluation of Existing Submission Practices and Rationale for Changes*

It is important to keep in mind that the changes proposed in the earlier draft were actually just an attempt to enforce our [existing policies](http://osp.unm.edu/sites/default/files/Deadline%20Submission%20Policy%201%206%2014.pdf). Our current published deadline for submissions to the OSP is 5 working days before the funding agency’s submission deadline. Unfortunately, the existing 5-day deadline is increasingly missed and there has been a growing trend toward last minute submissions. An analysis of our submission data from last year shows that over 40% of all proposals are submitted after the existing 5-day deadline, and most of those are submitted within 24 hours of the funding agency’s submission deadline. There is no denying that there are calls for proposals with relatively short timelines and that PIs are sometimes asked by colleagues, program managers, and foundations at the last minute to submit proposals. But the number of times this happens is far smaller than the number of late proposals would suggest. The problem with late proposals, however, is not simply that they violate policy. The real problem is the extra cost, risk, and stress they entail. Our Director of Sponsored Projects, Rosa Gonzalez-Rosenblatt, audited our current submission practices and estimated that, last year alone, late proposals cost UNM $2M in lost F&A recovery and about 1.5 FTE in additional labor costs. This is real money that could be used to support faculty research.

Our current practice (as opposed to our policy) allows PIs to work on proposal packages up until the last minute, provided the budget and budget justification are received in the OSP 5 days in advance of the submission deadline. However, because there is no electronic research administration software package that can isolate the budget from the rest of the proposal package (we’re working on it), OSP staff are forced to check the budget multiple times during that 5-day period to determine whether it has been modified. Moreover, because approximately 90% of all proposal budgets are submitted with errors, it is typical for OSP staff, PIs, and department/center administrators to engage in a series of email and telephone exchanges right up to the last minute to make sure submitted budgets are both accurate and in compliance with agency and University guidelines. To compound the problem, too often the language in the body or technical sections of proposals, which we have heretofore allowed to be submitted at the last minute, contradicts or is inconsistent with submitted budgets, stipulates incorrect F&A rates, and/or offers voluntary cost share or other unallowed institutional commitments. Given that OSP handles over 1200 separate proposal transactions a year, this time consuming iteration greatly increases staff workload and stress. Moreover, late submissions (i.e. after the 5 day deadline) often do not afford sufficient time for review and correction before the agency deadline, and sometimes results in the submission of un-reviewed and uncorrected proposals. This costs everyone (OVPR, academic units/centers, and PIs) money and puts UNM at substantial financial and legal risk.

*The New Policy*

The proposed policy changes that were circulated in May were an attempt to rectify the problems identified with our current submission practices. However, in response to the feedback we received from faculty and administrative staff, we have modified those changes. The full final policy is attached to this email, but I will summarize the major changes here. **Please note, this policy will be implemented on September 1, 2015.** We will still stick with a **5-working day deadline** **for the submission of** **budgets, budget justifications, all routing queue certifications and approvals** (see the attached policy for a complete list of required documents). Once budgets are submitted, PIs and administrative staff will be asked not to make any changes without directly notifying the OSP staff assigned to the proposal**.** OSP staff, however, will be able to modify submitted budgets and will communicate all changes to the PI and/or administrator. **The** **technical sections of proposals can be submitted later but will be held to a 2-working day deadline. All proposals that are submitted to the OSP on time and are in accord with University, state, and federal guidelines will be submitted to the funding agency**. **However, proposals submitted to the OSP within 2-working days of the funding agency’s submission deadline will not be submitted**. **Proposal packages submitted between the 5-day and 2-day deadlines may be reviewed and submitted, but they will not be reviewed ahead of any complete proposals already in the queue, and submission is not guaranteed.** I would add, by the way, that the deadlines we are enforcing are clearly in line with those at other universities and more generous than many. Our own HSC, for example, has a 10-day submission deadline to their Sponsored Projects Office

In the previous draft, there was mention of a $500 penalty or service fee in the form of a reduction in F&A allocation for late submissions. As expected, that proposal prompted a number of responses raging from puzzlement to outrage. We were reluctant from the beginning to go the service fee route because we knew it would be controversial, that it smacks of administrative insensitivity, and that it might contribute to an “us vs. them” mentality. This, of course, is not our intent, but our attempts to address this problem in other ways have met with little success. It is possible, however, that enforcement of the new submission policies may in themselves substantially reduce the number of late submissions without the potential downside of imposing penalties. Accordingly, we will not automatically impose service fees on late submissions. However, as we have done since the beginning of this calendar year, a monthly list of late submissions will be provided to Deans, Chairs and Center Directors, and if problems with late submissions persist, we will revisit the idea of imposing a service fee.

*Faculty Support*

Many of the comments we received in response to the earlier draft mentioned the lack of administrative support available to PIs for proposal preparation, and others asked about the accountability of the OSP. These are real and serious issues and over the past two years we have tried to increase OSP accountability and PI support at all administrative levels. We believe that PI support should start at the department, but it’s clear that while some departments employ staff specifically to help with proposal preparation and project management, many others do not. Our efforts to increase PI support at the department level include the hiring of a training specialist, Vanessa Tan, to curate and coordinate all of the training materials associated with research. New department staff or staff wishing to learn more about preparation or management now have a single point of contact for training. Vanessa has already placed many training materials on-line or in Learning Central. Vanessa can be reached at vtan@unm.edu or 277 2500.

At the College level, the popular Faculty Research Support Officer (FRSO) program has been restructured and expanded. Given the wide differences in types of research and sponsored projects across campus, we have provided funding to the most research active schools and colleges to directly hire their own FRSOs (or equivalent). Thus, dean’s offices can assign proposal support staff within a college as needed. Currently, the College of Arts and Sciences, School of Engineering, College of Fine Arts, and College of Education are either interviewing candidates or in the process of posting the positions.

At the OVPR level, Dr. Mary Jo Daniel has been hired as Director of Faculty Research Development. Along with Monica Fishel and recently hired FRSO, Kathleen Gygi, the Faculty Research Development team will coordinate faculty research support across campus and work to develop long-term faculty research areas with the goal of positioning UNM to compete for larger center, interdisciplinary, and collaborative proposals. Dr. Daniel and her team can be reached at mjdaniel@unm.edu or 277-0168.

Finally, both the OSP and Contract and Grant Accounting (CGA or “post-award”) have been reorganized under new leadership (Isela Roeder and Debora Selke, respectively) to provide more efficient and integrated proposal and grant support to faculty. In addition, we are currently seeking to hire a full-time contract negotiator in the OSP to address the long-standing and time-consuming bottlenecks in our contract negotiation process and award index setup. With regards to OSP accountability, these changes are largely in response to results of the faculty and staff satisfaction survey conducted last year and all are intended to provide increased PI support and quality service. In addition, to continuously assess the quality of OSP and CGA services, all PIs will be offered an opportunity to complete a “customer satisfaction” survey at the end of each submission process. This information will be used to further refine and improve our grant and contract processes going forward. Although the policy changes outlined here are an attempt to address problems with late submissions, the best advice for all PIs is to make contact with the OSP well in advance of submission due dates and to work together with that staff to prepare and complete the proposal package.

Attachment: Proposal Submission Guidelines & FAQ (Eff. 09/01/15)