I. PURPOSE

Complex and multi-PI proposals require additional planning and integration between groups, both academic and administrative. They also contain multiple projects, cores and/or subawards requiring significant coordination. This SOP outlines the pre award processes and roles and responsibilities for complex and multi-PI grant proposals.

Limitations: This SOP is limited to proposals that would involve multiple awarded components such as multiple projects, cores and/or subawards, and should be used in conjunction with Research Proposal Application Process SOP # 1002.

II. INTRODUCTION

Large, complex proposals can involve several research projects, cores and/or subawards, include multiple PIs, and often contain multiple elements that require additional time to develop. Examples of these, but by no means a complete inventory, are National Institutes of Health (NIH) P-series awards (program projects and center grants), certain NIH or Department of Defense contracts, NIH U-series awards (cooperative agreements), and NIH R-series awards that specifically identify more than one PI.

This document outlines the processes for proposal submission, just-in-time (JIT) submission and award receipt for large complex awards. It is essential to note that coordination across multiple departments/units and PI is critical to the success of managing large complex proposals across pre and post award functions.

It is important to note that the RAS Unit/Pre Award Administrator associated with the PI (or contact PI in case of multiple PIs) will be the main point of contact for compiling documents related to large complex proposals and following the processes outlined below. It is the responsibility of the RAS unit that supports the prime Contact PI to ensure that information and approvals relating to all projects within the proposal are obtained – regardless of which RAS units support the faculty on those projects.

Note: This SOP should be used in conjunction with the Complex Award Management – Post Award SOP # 2001 when managing complex awards. It is essential that both the Pre Award Administrator and the Post Award Administrator work together in Complex Award management.
III. PROCEDURE

Pre Award

1. Proposal Preparation, Review, and Submission

In addition to the procedure outlined in Research Proposal Application Process SOP # 1002, Complex Awards require additional time for development and processing of necessary components, including:

- Budget development for the Primary PI and for cores/projects that involve multiple PIs, multiple institutions (subawards) and/or cross multiple Schools/units (See Budget Development SOP # 1004)
- Identifying administrative resources necessary to administer the grant and submitting Cost Accounting Standards (CAS) exception request, if necessary and required by School/unit for submission (See section e below)
- Preparing non-scientific sections such as biosketches and compiling all required documents including subcontract consortium letters
- Necessary internal approvals for proposal including PI and Investigator certification of proposal and Conflict of Interest (COI) forms
- Preparing Proposed VA MOU for all faculty named in the proposal with a VAMC appointment as per attached job-aid.
- MOU disclosure statement must be included in the budget/personnel justification disclosing the faculty member’s total professional effort.

a. Deadlines for notifying RAS of intent to submit (See Notification of Intent to Submit SOP # 1001) and sending information to OSP (See Summary Table Below)

<table>
<thead>
<tr>
<th>Due Dates</th>
<th>Intent to Submit</th>
<th>Final Proposal Due to OSP</th>
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<tr>
<td>All complex proposals</td>
<td>The Intent to Submit notification should be submitted by the Primary PI to RAS as soon as feasible. Due to the complex nature of these projects, we strongly recommend allowing a minimum of 75 days to notify RAS of intent to submit in order to begin the proposal development process.</td>
<td>Primary PI proposal should be submitted to OSP no later than 5 business days before the sponsor deadline.</td>
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b. Pre Award Administrator, or assigned designee, prepares the EPEX record (See Associated Document 2. Job Aid: Entering a Complex Proposal). This record will become the Parent record for the Multi-Project Award and will be the primary record for attaching project files and tracking compliance requirements related to the proposal. Please refer to the Research Proposal Application Process SOP #1002 that provides more detail around this step.

c. Pre Award Administrator creates one Subproject for each Project/Core to match the structure of the proposal budget in EPEX. Each subproject should be named in EPEX using an easy to follow naming convention such as: Project/Core # - Grant Title (e.g. “Project 2 - Translational Research on Lung Cancer”).

i. The investigator for each specific subproject or core may differ from the overall PI. In this case, the actual investigator leading the subproject or core is named as PI/Project
Leader of that EPEX project (as long as the PI is in the same institution; subcontracting PIs of subprojects/cores would show under the Program Director). It is recommended that prior to this EPEX project being established, the Pre Award Administrator should notify the appropriate investigator and their corresponding Pre Award Administrator, if appropriate, by email that a separate EPEX subproject is being created. The Pre Award Administrator assigned to the overall PI will enter all personnel effort and project costs on the appropriate subproject budget in EPEX, not on the overall project record budget.

d. At the time of proposal submission, dedicated and appropriate administrative personnel should be budgeted on the Administrative Core of Program Project Grants or similar component identified within the sponsor’s Program Announcement or Request for Proposal, if appropriate or allowable.
   i. The % of administrative full-time employee (FTE) is dependent upon the scale of the project but a minimum of 25% FTE is recommended. If a dedicated administrative resource is not identified within the budget, a detailed explanation must be provided by the PI and Departmental Administrator (DA) explaining how the award will be administered using existing resources.
   ii. If the proposal does not allow administrative expenses and PI/department does not have sufficient resources, the PI should submit a request to the Associate Vice President for RAS to outline their request for administrative support at the Just-In-Time (JIT) stage (or as soon as funding is anticipated) in the event the proposal is funded. Administrative personnel can still be charged as a direct cost to complex awards such as program project grants if the award uses an administrative core to charge post award administrative salaries to research grants. Such charges of administrative salaries are subject to receipt of a CAS exception approval (see CAS Exception SOP #2014).
   iii. At time of award, the Proposed VA MOU should be updated to reflect any changes in awarded effort in the event a revised budget was necessary due to agency’s reduction in the total amount awarded. The corrected Proposed MOU would then be routed as a Revised VA MOU and all signatures must be obtained. (PI, Dept, VAMC and OSP).

e. Each individual named as key personnel or meeting the definition of Investigator, as per Emory policy, in the proposal is required to submit a Conflict of Interest (COI) form and must be listed on the appropriate Subproject budget as either Key Personnel (effort on project), Staff, or Significant Contributor (no effort on project) in accordance with Emory University COI policy 7.7 (http://www.coi.emory.edu/policies/index.html). (See Research Proposal Application Process SOP # 1002 for more information on this process)

f. Attachments, including internal documents and the sponsor application should be uploaded to the Parent record using standard naming conventions in order to easily identify proposal elements.

g. The review of each project and core, budgets, internal documents, and sponsor application materials are done in accordance with Research Proposal Application Process SOP #1002.

Once review has been completed and the proposal is approved, OSP will submit to sponsor according to the process outlined in Research Proposal Application Process SOP #1002.

2. Just-In-Time Submissions
   a. Following receipt of a JIT request for a Program Project Grant or other Complex Proposal, the Pre Award Administrator will work with the PI or designee to prepare and submit JIT materials in accordance with the JIT SOP #1006, with the following modifications:
i. The Pre Award Administrator will confirm that any needed IRB/IACUC approvals, specific to the grant, have been linked to the appropriate Parent Record. The IRB/IACUC approvals should be linked to the Parent record, even if one or more of the subprojects do not use human subjects or animals.

ii. It is the responsibility of the Project Director/PI to ensure that all specific aims using humans/animals are reviewed and approved by the appropriate IRB/IACUC office. The approvals may still be pending at this point, which will either delay the issuance of the award or will provide the need for human/animal research restrictions on the award until the approvals are submitted.

iii. The Pre Award Administrator should speak with the primary Post Award Administrator (assigned to the primary PI) at JIT regarding expectations for award set up.

iv. The Pre Award Administrator will submit JIT materials to OSP for their review. OSP will do a final check of the final material to ensure that all data quality standards have been met.

v. Subproject records and subcontract budget folders should fall under the related scientific project or core when setting up the record. The following are a few examples of how the records might look depending on the situation:
   - Project with no subcontracts
   - Project with only subcontracts; no prime budget (or can use the Administrative Core)
   - Project with a prime budget and a subcontract

3. Award Receipt
   a. The following applies to both initial and non-competing continuation notices of awards (NOAs):
      i. Upon receipt via the grants inbox and after award review and acceptance, OSP will process the award as outlined in Award Setup SOP #2003.

   b. The Post Award Administrator from the PI contacts the other Post Award Administrators (referred to as non-primary Post Award Administrators), including those in other RAS units, associated with other projects or cores within one business day to confirm the budget amounts, including the amount for any subcontractors involved.
      i. If preferred, the primary Post Award Administrator will setup a meeting (refer to Award Setup Meeting in Complex Award Management Program Projects/Multi-Fund Awards-Post Award SOP# 2001) with the Post Award Administrators to understand how the budgets will be awarded across the various projects and cores.
      ii. The primary Post Award Administrator is expected to send the final budget confirmations to the PI/Project Director and Co-PI/Core Leaders within 3 weeks of the initial budget confirmation request.

*Escalation:* If the revised budgets are not submitted by the non-primary Post Award Administrators to the primary Post Award Administrator within two weeks of the initial budget confirmation request, primary Post Award Administrator will escalate to the Director or Post Award designee of the primary RAS unit. At three weeks escalation will occur to the Directors of RAS units and Department Administrators of the PIs involved in the project that have not submitted revised budgets. At four weeks, escalation will occur to the AVP RAS.

Please refer to the Complex Award Management Program Projects/Multi-Fund Awards-Post Award SOP# 2001 for next steps after Award Receipt.
Note: As needed, the Post Award Administrator will also obtain collaborative split (involves collaboration between investigators in more than one School or Operating Unit which meets the $10,000 threshold) approvals as outlined in the Research Proposal Application Process SOP #1002. The collaborative Split Policy can be found here: http://policies.emory.edu/7.10

V. ROLES AND RESPONSIBILITIES

Outlined below are the high-level responsibilities of the individuals involved in the process. For detailed responsibilities, refer to each step of the SOP process and Research Proposal Application Process SOP #1002 and Budget Development SOP # 1004.

Principal Investigator (also known as Program Director for program project grants):
- Provides scientific, administrative and financial oversight of the grant as a whole, including supervision of all projects, cores and subcontracts.
- Notifies RAS unit of intent to submit complex proposal as early as possible and preferably at least 90 days prior to due date.

Pre Award Administrator:
- Assists PI in proposal preparation, review and submission procedures.
- Monitors proposal approval workflow in EPEX and COI form completion to ensure approvals are timely, and follows-up as necessary.
- Reviews the proposal and Just-In-Time information for the PI, including required materials for other Schools/units or institutions involved in the proposal.
- Collaborates with non-primary RAS units as needed for proposals that involve multiple Schools/units.
- Works with the PI and Post Award Administrator during award setup meetings to facilitate discussions on budget.

**************************************************************************END OF SOP**************************************************************************