

RAS Proposal Review and Approval Responsibilities

FAS departments and centers are strongly encouraged to reach out to their RAS pre-award contact person for assistance with application procedures and questions they may have about sponsor and university policies during the proposal preparation process.

What types of proposals and requests require RAS review and approval?

- New and Competing Renewal proposals meeting **ANY** of the following conditions:
 - Total Project Costs exceed \$2 million
 - Indirect Cost rate used is less than our 69% federally-negotiated Organized Research rate
 - Cost Sharing (either mandatory or voluntary) is committed
 - Subawards/Subcontracts are included in the budget
 - Multiple Tubs and/or Orgs are involved
 - Exceptional PI Rights are required (not including appointment types listed under [PI Eligibility with Limitations](#))
 - Provost Review is required based on the University's [Provost Review Criteria](#)
 - Institutional Training Grants (e.g. NIH T32)
 - Industry Sponsored Research Agreements (ISRA)
 - Grant-making Grants
 - Incoming faculty grant transfers
- Budget revisions involving cuts of 25% or more of proposed Total Project Costs
 - Significant budget reductions should be accompanied by a reduction of the project's Scope of Work
- Changes made during the life of a funded project:
 - Supplemental funding requests
 - Addition of new Cost Sharing commitments
 - Addition of new Subawards/Subcontracts
 - Addition of new Interfaculty Involvement
 - Budget revisions impacting IDC recovery that require sponsor prior approval

What types of proposals and requests do not require RAS review?

- New and Competing Renewal proposals meeting **ALL** the following conditions:
 - Total Project Costs are less than \$2 million
 - Indirect Cost rate used is our 69% federally-negotiated Organized Research rate
 - No Cost Sharing (either mandatory or voluntary) is committed
 - No Subawards or Subcontracts are included in the budget
 - Only one Tub and Org is involved
 - Principal Investigator is a faculty member or other individual whose appointment type grants them PI rights on a continuing or limited basis (see [Principal Investigator Eligibility](#))
 - Provost Review is not required

- Proposal is not for an Institutional Training Grant (e.g. NIH T32), Industry Sponsored Research Agreement (ISRA), Grant-making Grant, or an Incoming faculty grant transfer
- Graduate and Postdoctoral Fellowships
 - Typically defined as projects with students/postdocs proposed as PI and their advisor(s) as Sponsor or Mentor
 - Includes NSF Doctoral Dissertation Improvement (DDIG) and Research Improvement (DDRIG) proposals and NIH K99 Pathway to Independence proposals
- Federal Equipment and Instrumentation Grants
 - Proposals for the Defense University Research Instrumentation Program (DURIP), NIH Shared (SIG) or High-End Instrumentation (HEI) Grants, or similar awards that solely fund the purchase of a piece of major equipment do not require RAS review unless they meet other criteria as described above
- Budget revisions involving cuts of less than 25% of proposed Total Project Costs
 - Reductions of any size should be accompanied by an evaluation of the project's Scope of Work to determine whether it is still reasonable within the reduced budget amount
- Changes made during the life of a funded project:
 - Continuation requests (e.g. non-competing progress reports)
 - No-cost Extension requests
 - New Account requests
 - Pre-Award Costs requests
 - At-Risk Account requests
 - Change Tub/Org requests
 - Change PI requests
 - Rebudget Restricted Categories requests, unless IDC recovery is impacted as noted above
 - Outgoing PI transfers and early award terminations

How does the review and approval process work?

Once a proposal is locked and routed for review in GMAS, the Department, RAS (if required), and the Office for Sponsored Programs (OSP) will review the proposal with a set of distinct, but related, review criteria in mind:

Department Review (conducted by FAS Department/Center/Institute)

Department/Center/Institute signatures in GMAS indicate:

- Approval of the PI as a member of the department in good standing and confirmation that the PI holds appropriate PI Rights within the department
- Knowledge and approval of the subject area of the proposal
- Approval of departmental resources (e.g. space and facilities, explicit or implied cost sharing, personnel) used by and/or committed to the project
- Approval of PI and Senior Personnel effort commitments relative to their overall responsibilities and commitments to the department
- Acceptance of responsibility for grant management and departmental oversight, if proposal is funded

- Budgeted expenses are allowable, allocable, reasonable, and consistently treated and in compliance with FAS, University, and sponsor policies
- Proposal is complete and ready for RAS and/or OSP review

FAS School-level Review (conducted by RAS Dean/Designee Signatory)

It is RAS' primary responsibility to:

- Review budgets and budget justifications for:
 - Use of appropriate Indirect Cost rates (On-Campus or Off-Campus; Organized Research or Other Sponsored Activities)
 - Use of appropriate Fringe Benefits rates
 - Cost Sharing Commitments
 - Effort Commitments
 - Allowability, allocability, reasonableness, consistent treatment of costs
 - Adequate reflection of the proposed Scope of Work
- Review individuals designated as Investigators and/or Key Personnel to confirm:
 - Appropriate PI Rights are in place or have been granted
 - Required Financial Conflict of Interest (COI) disclosures have been filed
- Ensure that the following school-level concerns and policies are properly addressed:
 - Cost Sharing forms are completed and approved by the appropriate parties
 - Subawards/Subcontracts are properly budgeted
 - Dean or Divisional commitments (e.g. space or other forms of pledged support) are approved by the appropriate individuals
 - FAS/SEAS Policy on Assessments on Current Use Gifts and Sponsored Awards is properly applied in proposals submitted to non-federal sponsors

University-level Review (conducted by OSP Proposal Review Team)

In addition to reviewing for accuracy and compliance with sponsor guidelines and policy, proposal review by the Office for Sponsored Programs warrants that the legal and fiscal interests of the University are protected, and that detailed contract provisions involving intellectual property (e.g. patents and copyrights), restrictions on publication or other sharing of data or research results, external control over hiring practices, etc., conform with those considered acceptable by the University.

Unlike RAS, which limits their involvement to the review of the proposal and request types specifically outlined above, ***all proposals for external funding awarded to and administered by Harvard must be reviewed and approved by OSP.***

It is OSP's primary responsibility to:

- Review proposals for compliance and accuracy with sponsor guidelines and requirements
- Review proposals for compliance with University policies
- Route proposals to the Provost Office for review if they meet any of the [Provost Review Criteria](#)

- Review non-standard terms and conditions and, if necessary, liaise with other central offices (Office of Technology Development, Office of the General Council, etc.) to ensure the University can comply with award terms
- Collaborate with Department and/or RAS to correct and revise proposals in response to concerns or errors identified
- Update the GMAS Approvals module to reflect each project's or person's compliance with University and sponsor policies
- Provide sponsor certifications and assurances (e.g. Representations and Certifications, Disclosure of Lobbying Activities, Felony Convictions and Tax Delinquency)
- Review accuracy and integrity of GMAS data to confirm that proposal details are properly captured
- Review GMAS request for inclusion of RAS Dean/Designee Signatory on proposals meeting the RAS criteria as outlined above; add appropriate signatories when necessary

How does my proposal get submitted to the sponsor?

Once review is complete and the required Department and RAS signatures are recorded, OSP will:

- Sign off on sponsor-required forms or approval letters as the Authorized Organizational Representative (AOR), also known as an Authorized Signatory or Institutional Official
- Provide signed Statements of Intent (SOI) or Letters of Intent (LOI) for subaward proposals
- Submit final proposals to sponsors or confirm that submission will be handled by the department:
 - For proposals submitted through electronic application portals centrally managed by OSP, such as Grants.gov Workspace, NIH's ASSIST, or NSF's Fastlane or Research.gov, OSP will:
 - Communicate any system errors or warnings to the PI/Department
 - Problem-solve any technical or systematic issues
 - Send submission confirmation e-mails or screenshots to PI/Department
 - For proposals submitted through electronic application portals not centrally managed by OSP and to which PIs can submit directly, OSP will:
 - Determine, in consultation with the department, whether OSP or the department will be responsible for submitting the proposal to the sponsor
- Sign off on the GMAS request as the University Authorized Signatory or Sponsored Approver

After submission, OSP will:

- Coordinate post-submission communications with the sponsor
- Upload submission confirmation notifications to the GMAS document repository or confirm that the department has uploaded submission confirmation notifications
- Lock final submitted version of proposal documents
- Change proposal status in GMAS to Submitted to Sponsor