## 5 Day Application Review Deadline

**Policy No.: 0001**

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<th>Date Revised</th>
<th>May 24, 2019</th>
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<td><strong>Original Issue Date</strong></td>
<td>December 21, 2006</td>
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| **Purpose / Background** | As an applicant organization, Duke University has an institutional responsibility to verify the accuracy, validity, conformity and eligibility of all applications submitted to a sponsor on behalf of the Duke University School of Medicine. This responsibility is shared with several institutional stakeholders including the Principal Investigator (PI), the PI’s Chair or Director (or designee), business manager, grant administrators, and the Office of Research Administration (ORA).

As the authorized organizational representative (AOR) delegated by Duke University, ORA reviews the application to make the necessary representations, certifications and assurances to the external sponsor. The AOR is responsible for ensuring that applications are compliant, and that institutional and sponsor policies and guidelines are met - including administrative, fiscal, and scientific information in the application. |
| **Scope** | All applications by Duke School of Medicine or Nursing faculty, students or staff must be reviewed and approved by the Office of Research Administration (ORA) prior to submission. |
| **Policy** | **A complete and compliant application must be received by ORA no later than five (5) business days prior to the sponsor’s deadline (the “internal deadline”).**

If the application is to be submitted via Grants.duke, all components must be uploaded by the internal deadline. If an application is to be submitted using a sponsor electronic system, ORA must also have access to review and submit the application using the sponsor’s system by the internal deadline. Failure of the Principal Investigator (PI) or his/her designee to grant ORA access to the final application may result in the application not being submitted timely or not being submitted at all. |
The “technical” or “scientific” sections may be submitted in near final form to allow additional time to finalize these sections prior to submission, though it is expected that these sections will differ only slightly from the submitted version (e.g., minor editing such as typo/grammar corrections, figure captions, updates to data tables, references cited or bibliography).

Expeditied or After-the-Fact Review

On rare occasion, situations may arise that require expedited review. In these situations, the owning organizational unit must request a waiver by completing the Grant Application Waiver Request available on ORA’s website. If the waiver is approved, ORA will make every effort to ensure a successful submission.

Applications that must undergo expedited review will be reviewed after-the-fact and may be withdrawn if non-compliant with institutional or sponsor requirements.

Applications that are found to contain any of the following errors after submission will be withdrawn:

- Placeholders
- Non-compliance with institutional policy – e.g., publication restriction without exception letter, cost sharing, improper use of name/logo/trademark
- PIs no longer affiliated with or physically located at Duke
- PI/institution does not meet eligibility requirements
- PI not selected to submit the proposal (limited submission)
- Falsified information, data, signatures

Deliberate withholding of information, falsification, misrepresentation or carelessness in carrying out the processes, authorizations, notifications, or responsibilities required to review an application and make necessary assurances may result in administrative actions, such as withdrawal or rejection of an application, suspension and/or termination of an award, debarment of the PI, project personnel or Duke University, as well as the imposition of civil fines and criminal penalties.

The internal deadline applies to all types of applications/proposals, paper, electronic, new and non-competing as well as to all sponsors.

The internal deadline applies to all sections of the application. The “technical” or “scientific” sections may be submitted in near final form to allow additional time to finalize these sections prior to submission.

All business units collaborating in the project must approve the SPS record, and the record must be fully routed (in “pending central approval – PCA” status) to meet the
The Principal Investigator (PI). The PI ensures that the application is complete, accurate, and meets all programmatic, administrative, and compliance requirements. The PI may delegate certain components of application preparation to the PI’s research team, grant administrator or others within the business unit, but the PI retains personal responsibility and accountability for the content of all portions of the application, including post-submission revisions. Multiple PIs on a single project or the inclusion of a Co-PI requires the assignment of responsibilities between the PIs in accordance with a written Multiple PI Plan or other documentation.

The Business Unit. The business unit reviews the application for consistency with specific unit-level policies and procedures as well as various institutional requirements. Business unit review includes an assessment and approval of the following: an accurate budget; costs are allowable, reasonable and allocable to the project; personnel listed are available and qualified to participate; facilities are available; any proposed cost-share is adequately documented and accurate; appointment information is accurate; Institutional Base Salary (IBS) is accurate; and any F&A waiver is approved by the business unit official (e.g. Chair or designee) before submission to ORA.

The Grant Administrator. The Grant Administrator compiles the components of the application and completes the SPS record data fields, as delegated by the PI. The Grant Administrator receives ORA Review Comments and makes necessary revisions as delegated by the PI.

The Office of Research Administration (ORA). ORA reviews applications for consistency and compliance using sponsor policy and program-specific guidelines, federal regulations, Duke University policies, ORA internal review guidance and information provided by the PI. ORA certifies to the sponsor that the institution will be accountable both for the appropriate use of any funds awarded and for the performance of the grant-supported activities to be undertaken, if funded.

Other Resources

ORA Application Review & Submission Process
ORA Application Waiver Request
NIH: How We Check for Completeness