

Announcement from Dr. Liz Klonoff on 5-Day Rule

Last month I updated you on some of the changes that were occurring at the Office of Research as we realign some of our functions to provide better customer service to the university community, operate more effectively and march forward toward achieving our Collective Impact strategic goals.

I am reaching out again with a very important update that will require some shared responsibility on the part of investigators seeking sponsored project opportunities and our staff.

We will be implementing what has quickly become known as the 5-Day rule. Beginning Jan. 22, the Office of Research will require that investigators applying for sponsored projects submit all proposal documents required for review through ARGIS at least five (5) business days before they are due to a funding agency. The Office of Research will not submit proposals that miss the 5-day deadline without authorization of the Associate Vice President for Research and the Associate Dean for Research of your college. It is the policy of UCF that all sponsored project proposals be submitted through ORC, see [Policy 4-214 Proposal and Acceptance of Sponsored Awards for Research and Development](#) for additional information.

ARGIS, the software system that you use to submit forms now, has been updated to accept all necessary forms and still allow you access to make changes to the technical narrative of your proposals up to 48 hours before close of business on the due date. That means you can continue to work on the technical portion of the proposal up to then. However, all other necessary portions of the proposal packet including the completion of the newly-revised Proposal Transmittal Form in its entirety, the budget and departmental approvals must be submitted in time to meet this five (5) business day window.

The change is necessary to improve our review of the proposals. Currently most of the submissions are uploaded into ARGIS the day they are due to a funding agency, giving ORC staff virtually no time to ensure proposals meet the funding agencies' requirements and have been vetted internally.

Other universities require investigators submit their proposals anywhere from five days to two weeks before the due date.

ORC staff spend time reviewing proposals to ensure funding agency guidelines and requirements are met as well as ensuring that budgets, facility and environmental concerns the proposal may raise, are adequately addressed. This is also a way for our research administrators to prepare in anticipation of you getting the award, so that when money is awarded, disbursement is a seamless process.

ORC staff will properly review your submission and return it to you with any feedback and/or required changes within two days of initial submission so that you can make any necessary changes to ensure the proposals meet funding agencies requirements. This is where shared responsibility is key.

I have spent the past several months visiting each college to explain why this window to reviews is necessary, because it is vitally important in moving us ahead as we seek more funding opportunities.

Our goal is to double our research dollars by 2020. I have an even simpler goal. I want the Office of Research to help you achieve your goals – to do the research you want to do. To get there we need to work together and this is an important step in the process.

UCF Office of Research Proposal Submission 5-Day Rule

FAQ

Background: The UCF OR Five-Day Rule went into effect in January of 2018. At that time, UCF was using a proposal processing system called ARGIS. Since then, much has changed. UCF now uses the System-to-System electronic research administration (eRA) system called Huron Research Suite (HRS). The number of proposals processed annually has also significantly increased. New jobs have been created in the colleges and departments to support faculty in proposal preparation. The Office of Research has reorganized so that staff are now specialists in their specific areas of expertise and can facilitate the rapid increase in research proposals and awards at UCF. The Five-Day Rule was established as a strategy to improve and effectively manage the quality and volume of proposals submitted on behalf of UCF researchers.

The original Five-Day Rule FAQs have been updated below to align with current systems and organizational structure.

Definitions:

- **5-Day Rule:** A required timeline for proposal submission to the Office of Research whereby Initial Review submission must take place at least 5 full business days before the sponsor deadline, and Final Review submission must take place at least 2 full business days before the deadline.
- **ARGIS:** A UCF-developed eRA system used to route research proposals and awards. It was replaced by Huron Research Suite in October 2019.
- **Cost Share:** Any cost for a proposed project, including salary, that is not funded by the sponsored award.
- **Department Research Administrator:** The staff member at the unit, department, or college level who supports faculty to prepare and submit proposal and award documents to the Office of Research.
- **Funding Proposal (FP):** The proposal record in Huron Grants used to route internal proposal reviews and submissions to sponsors.
- **Huron Research Suite (HRS):** UCF's current eRA system used to route proposals (Huron Grants), awards, agreements, IRB, and IACUC.
- **Indirect Cost Rate:** A federally negotiated rate that is charged to all sponsored projects in addition to direct project costs.
- **Direct Sponsor:** The pass-through entity from which UCF receives funding directly.
- **Prime Sponsor:** The originating source of the project funding.
- **Proposal Specialist:** The Office of Research staff member who is authorized to review and

submit proposals on behalf of UCF and UCF Research Foundation.

- Subrecipient: A non-federal entity that receives a subaward from a pass-through entity to carry out a part of a federal program.
- Technical Narrative: The main body of a proposal which typically discusses the research background and plan. The Technical Narrative can also be referred to as the “technical portion” or “statement of work” (SOW) in an application for sponsored funding.

1. What is the 5-Day Rule?

The 5-Day Rule requires the following:

- a. All proposals for sponsored projects at UCF must be submitted for Initial Review through Huron Grants not less than five full business days prior to the agency deadline. All proposal documents must be submitted in complete and final form, except the technical narrative/statement of work, which may be edited until submission for final review.

Example internal submission deadlines for Initial Review:

- Sponsor deadline: Friday by 9am -> Internal deadline: previous Friday by 9am
 - Sponsor deadline: Friday by 4pm -> Internal deadline: previous Friday by 4pm
 - Sponsor deadline: Friday by 5pm-12am -> Internal deadline: previous Monday by 8am
- b. The proposal specialist in the Office of Research must provide comments from an initial review of the proposal within 2 full business days of receipt of the HRS Funding Proposal record. Comments shall be based on applicable laws, regulations, policies, procedures, completeness, and responsiveness to the sponsoring agency guidelines.
 - c. The proposal must be resubmitted for Final Review through Huron Grants not less than two full business days prior to the sponsor’s deadline. The proposal must be ready to submit to the sponsor.

Example internal submission deadlines for Final Review:

- Sponsor deadline: Friday by 9am -> Internal deadline: previous Wednesday by 9am
- Sponsor deadline: Friday by 4pm -> Internal deadline: previous Wednesday by 4pm
- Sponsor deadline: Friday by 5pm-12am -> Internal deadline: previous Thursday by 8am

2. **When was the 5-Day Rule implemented?** January 22, 2018.
3. **Are all proposals subject to the 5-Day Rule?** Yes.
4. **How can PIs receive instructions on how to use the new proposal system, HRS?** There are many Reference Guides, videos, and other resources located in the HRS Help Center. You can also reach out to your Department Research Administrator for one-on-one support.
5. **What happens if I submit my proposal less than 5 business days prior to the official sponsor deadline?** The Office of Research will not submit proposals that miss the 5-day deadline without authorization for an exception to the 5-Day Rule from the Vice President for Research.
6. **How do I obtain an exception to the 5-Day Rule?** Begin a draft proposal in the HRS system.

The request for an exception to the 5-Day Rule can then be made through HRS to your Associate Dean for Research (ADR). If your ADR recommends approval, you may proceed to submit proposal documents. A review for completeness and accuracy will take place by the proposal specialist in the Office of Research. Then a request for exception can be made to the Vice President for Research through HRS using the required template. **ALL REQUESTS FOR EXCEPTION TO THE VPR MUST BE MADE THROUGH HRS USING THE TEMPLATE.** For detailed instructions on how to submit a request for exception to the 5-Day Rule, click the link below: [Exception Request](#)

7. **My proposal is due to the sponsor at 11:59pm. Will OR submit the proposal after business hours to allow me more time?** No. Proposals are submitted from 8am to 5pm, Monday through Friday. OR personnel do not submit proposals on any day the university is closed for any reason. The OR staff also observe all federal and university holidays. If a proposal is due outside of normal business hours, or on a day when the university is scheduled to be closed, the timeline for proposal preparation should be adjusted accordingly. The investigator team must allow five full business days for review and submission no later than 5pm on a day when the university is open for business.
8. **Who can start a draft proposal in the HRS system?** The Investigator or Department Research Administrator can create a funding proposal in Huron Grants. Please refer to the Reference Guides for more detailed information.
9. **What parts of the proposal are required at Initial Review to be considered an on-time, accurate, and substantially complete proposal?** The full proposal, as required by the sponsoring agency, and all UCF-required supporting documentation and approvals, must be submitted in final form not less than 5 full business days prior to the sponsoring agency deadline. The technical narrative may be in draft form but should be substantially complete so that comparisons can be made between other sections of the proposal. If the sponsor does not have proposal guidelines, the investigator must submit a budget, a budget justification, and a scope of work, at a minimum. Incomplete proposals will be considered non-compliant with the 5-day Rule and will have to be granted an exception by the VPR through the exception process in HRS.
10. **Do the documents need to be in final format?** Yes. The documents should be in final format. Fine tuning of the scope of work (technical narrative) may continue until the documents are certified two full business days before the sponsor deadline.
11. **What if I need to make edits to documents other than the technical narrative between Initial and Final Review?** If minor revisions to a supporting document are needed based on final edits to the technical narrative, the PI or Business Unit must note which document(s) were revised when the FP is submitted for Final Review. This will ensure the Proposal Specialist knows to re-review these documents.
12. **Why is a budget justification a required document?** Certain elements of the budget cannot be reviewed without a budget justification. The budget justification is also needed for the Award Management and Grants Accounting teams to manage the account after it is funded.
13. **Can I just submit what I have for the OR Proposal Specialist Initial Review, even if the proposal is still very rough or incomplete, and still be considered as having complied with the 5-Day Rule?** No. Proposals are expected to be final and complete at the time of submission

to OR for Initial Review. The only exception to this is the fine tuning of the technical narrative. The OR Proposal Specialist will make notes of any portions of the proposal that have been omitted, are inaccurate, or are non-responsive to the sponsor guidelines in their Initial Review Comments. Incomplete proposals will be tagged “5-Day Rule: Incomplete at 5 day” if substantially incomplete at the 5-Day Rule deadline. This will become a part of the funding proposal record.

14. **Will the OR Proposal Specialist always submit a proposal, even if it is incomplete?** Proposals that are substantially incomplete will require going through the Exception to the 5-Day Rule Process to proceed. A determination will need to be made by the VP for Research upon the recommendation of the Associate Dean for Research whether to proceed with the submission.
15. **Is it necessary for me to follow the sponsor guidelines precisely as long as the information they require is included?** Proposals are expected to be responsive to the sponsoring agency guidelines. Failure to adhere to the sponsor guidelines may result in the proposal being rejected by the sponsor, or a determination that the proposal is substantially flawed and does not favorably represent the University of Central Florida. During initial review, deviation from the sponsor guidelines will be noted.
16. **What is the 2-Day Rule?** The 2-Day Rule requires all proposals to be in their final state and ready for submission to the sponsor two full business days prior to the agency deadline. By submitting the proposal for Final Review, the PI or College/Business Unit certifies that all parts of the proposal are complete and in final form (including the technical narrative), all comments and questions have been responded to, and the proposal is ready for final review by the Office of Research and submission to the agency.
17. **Can a PI submit a Funding Proposal directly to the Office of Research without going through their business unit (College, Institute, Center, Department) for review?** Each college business unit has its own process for the review and submission of proposals. The proposal must be submitted to the Office of Research for review five full business days prior to the sponsoring agency deadline. Please contact the leadership of your business unit to learn about their requirements for proposals. During the review process, your business unit leadership will be required to review and approve various aspects of the proposal. If you have not met the requirements set by your unit, it could create delays or failure for your proposal to be approved for submission.
18. **How will the Office of Research reviews be communicated?** All communication will take place through HRS. The FP’s history tab is the official record of the activities surrounding the proposal history.
19. **Does a proposal have to be fully routed for relevant approvals within the 5 business days?** Yes. The proposal must be fully routed with all required approvals before submission to the agency by the Office of Research. It is the responsibility of the PI to oversee the routing process through the business unit. If you have any special considerations (e.g.: course release, space requirements, cost share, equipment installation), it is recommended that you have discussions about these prior to submitting your FP for review to ensure a quick routing process.
20. **When should I request cost share for my proposal?** All requests for cost share must be made and documented through the HRS funding proposal. Cost share requests for the Vice President for Research must be made at least 10 business days prior to the sponsoring agency deadline. Cost share requests at all levels must be documented within the Funding Proposal record and

go through the review and approval process.

21. **What if I have a subrecipient on my proposal?** All subrecipient documents must be final and uploaded to a Funding Proposal record prior to submission for Initial Review in HRS. The 5-Day Rule applies to subrecipient packages. A list of required sub documents can be found at: <http://www.research.ucf.edu/Research/SubmissionGuidelines.html>
22. **What if I am a PI of a subaward and the Direct sponsor has given me a deadline that is different from the Prime sponsor's deadline. Which deadline do I use for the Five-Day Rule process?** When we are the subrecipient, the Lead institution (Direct sponsor) is actually our sponsor. If they set an earlier deadline than the Prime sponsor, you should use the Lead institution's deadline as the deadline date. Please provide documentation of the Lead institution's deadline in your FP's attachments. You will still be required to provide the RFP from the Prime sponsoring agency to ensure we are meeting all proposal requirements.
23. **What should I do if I have not received my Initial Review from the Office of Research within 2 full business days of submitting a Funding Proposal?** Please contact the Director of Sponsored Programs if this occurs. A metrics report has been developed to enable the Director to monitor timely performance.
24. **When should I request consideration for a reduction to the indirect cost rate?** The indirect cost rate must be determined before a Funding Proposal is submitted for Initial Review. Rate reduction requests should be made when a Funding Proposal is in draft form by sending an ancillary review to the Office of Research Director of Sponsored Programs. Requests should be made ten business days prior to the sponsor deadline to allow sufficient time for consideration, and to answer any questions that may arise. Supplementary documentation for an approved rate must be present in the FP's Attachments tab when the FP is submitted for Initial Review.
25. **Will proposals still be submitted if they do not meet the 5-Day Rule deadline?** If an exception to the Rule is approved by the VPR, the Office of Research will make every effort to submit, if possible, within our normal hours of operation. Please be aware of the following:
 - a. Proposals that are late are not put ahead of on-time proposals.
 - b. The Office of Research cannot guarantee proposals received with insufficient time for review will be submitted on time.
 - c. Although proposals may be submitted with insufficient time for review, those proposals may result in awards that are delayed or declined due to issues with the unreviewed content within the proposal, or sponsor terms and conditions that are unacceptable to UCF.
26. **Do hard copy submissions, which must be mailed or hand-delivered, have to be submitted to the Office of Research early?** Yes. Hard copy submissions require 8 full business days to allow sufficient time for review, copying, and mailing services. If the proposal is submitted less than 8 days before the deadline, the College or Business Unit will be responsible for preparing and mailing the proposal to the sponsor after the appropriate review and signatures have been obtained by the Office of Research. The 5-Day Rule would still apply.