

Date: July 17, 2023

To: HSC Community Research Community

From: Hengameh Raissy, PharmD, Interim Vice President for Research ^{HR}
Stacy Catanach, MBA, CRA, Associate Director, HSC Sponsored Projects ^{HR (Jul 18, 2023 12:25 MDT)} 

Re: Penalties for Proposal Submissions not reviewed by HSC Sponsored Projects Office

Per UNM Faculty Handbook E60: Sponsored Research, All external proposal submissions must first be reviewed/approved by the HSC Sponsored Projects Office before submission to the sponsor. Although, there are sponsors that will allow the Principal Investigator (PI) to submit directly without having authorized official approval, it is UNM Institutional Policy to first have the proposal reviewed by the HSC Sponsored Projects Office.

HSC Sponsored Projects must review all grant applications to ensure:

1. UNMHSC/PI are eligible to submit to the sponsor
2. Administrative information is accurate (i.e., billing address, contact information, correct signing officials)
3. Proposal terms are acceptable to UNMHSC and/or can be negotiated
4. Proposal meets the requirements of the funding announcement
5. Proposed budget is allowable per sponsor/UNM policy
6. Appropriate F&A Rate is applied to the budget
7. Internal compliance areas are addressed

When a proposal is submitted directly to a sponsor without the benefit of proper review by the appropriate offices, the proposal may need to be relinquished if we are not able to agree with the terms if awarded. This also puts undue administrative burdens on the HSC Central Offices, HSC Office of Research, and the submitter's departmental staff to accommodate an award which was not submitted in compliance with institutional policies.

Grants and Contracts are awarded to the University, not to the Principal Investigator directly, therefore, the award funds must be set up and tracked by the HSC Contract & Grant Accounting Office. The Principal Investigator and/or Department should refrain from receiving extramural funds directly from an external sponsor.

The following penalties will now be assessed if the proper process is not followed:

- **First Offense:** The HSC Vice President for Research will be notified and it will be mandatory for the PI and their staff to take the HSC Contracts and Grants Training for Faculty & Staff

- **Second Offense:** The HSC Vice President for Research, with feedback from HSC Sponsored Projects, will have the option to relinquish the award and/or charge the department a non-compliance fee of \$2,000.
- **Third Offense:** The grant award can be relinquished and a non-compliance fee of \$5,000 will be charged to the department.
- **Fourth Offense +:** The grant award ***will be*** relinquished and the department ***will be*** charged a non-compliance fee of \$5,000

The HSC Sponsored Projects Office is here to help ensure a favorable and compliant outcome of your proposal submission.







Non-Compliant Proposal Submissions

Final Audit Report

2023-07-18

Created:	2023-07-18
By:	Stacy Catanach (scatanach@salud.unm.edu)
Status:	Signed
Transaction ID:	CBJCHBCAABAAqBBnrRcLC2xTDS3fQzCQ-ETISVMyyZ6B

"Non-Compliant Proposal Submissions" History

-  Document created by Stacy Catanach (scatanach@salud.unm.edu)
2023-07-18 - 5:45:35 PM GMT- IP address: 206.192.168.20
-  Document emailed to hraissy@salud.unm.edu for signature
2023-07-18 - 5:46:24 PM GMT
-  Email viewed by hraissy@salud.unm.edu
2023-07-18 - 6:23:31 PM GMT- IP address: 206.192.168.22
-  Signer hraissy@salud.unm.edu entered name at signing as HR
2023-07-18 - 6:25:00 PM GMT- IP address: 206.192.168.22
-  Document e-signed by HR (hraissy@salud.unm.edu)
Signature Date: 2023-07-18 - 6:25:02 PM GMT - Time Source: server- IP address: 206.192.168.22
-  Agreement completed.
2023-07-18 - 6:25:02 PM GMT