

# **Computer Science and Artificial Intelligence Laboratory**

## **Policies and Procedures for Submitting Proposals**

Policy will be in effect for any proposal with a sponsor deadline on or after April 5 2021

### **Motivation**

Historically, CSAIL PIs were asked to submit proposals to their fiscal officer 2 days prior to the MIT Research Administration Services (RAS) deadline, which itself is 5 business days prior to the due date at the sponsor. However, we have found that this policy is insufficiently nuanced and is hampering our ability to provide PIs with the best support possible.

As a result of a long process of deliberation within CSAIL HQ and a period of consultation with PIs through different venues including the CSAIL PI meeting and meetings with individual CoRs, we have put together a policy that aims to provide PIs with maximal flexibility in submitting proposals while also ensuring that our fiscal staff have the breathing room necessary to ensure that all proposals are submitted to the sponsors on time and without errors.

These rules are part of a broader effort to improve our fiscal operations to ensure that PIs receive the support they need to succeed in a very competitive funding landscape.

In what follows we present in greater detail the new CSAIL fiscal policies for proposal submission on a CSAIL-wide basis.

### **New Proposal Submission Policy**

The intent of this policy is to improve the proposal submission workflow, reduce the risk of mishaps, and ensure fairness in the proposal submission process. The new policy is designed around three key principles:

- Not all proposals are equal in the amount of effort they require from the fiscal staff. It is therefore important not to overburden simple proposals with timelines meant for more complex proposals.
- Rather than follow the RAS approach of a single hard deadline for all the documents involved in a proposal, we aim to provide maximal flexibility to PIs by providing a more detailed timeline for the different elements of the proposal.
- While RAS requires a completed proposal five business days before the sponsor deadline, in practice there is often significant additional work that happens during those five days in order to address observations from RAS; it is therefore important for the rules to address what happens during this period as well.

## New proposal categories

In order to account for the fact that proposals may vary widely in the amount of effort required from the fiscal staff, we make a distinction between high and low complexity proposals.

**Low complexity:** A low complexity proposal is one where the fiscal staff is only expected to provide a simple budget and standard boilerplate documents. For example, a standard NSF small proposal with one or two CSAIL PIs that only requires a few students per year is considered a low complexity proposal.

**High complexity:** High complexity proposals require additional involvement from the Fiscal staff and therefore require additional lead time. For example a DARPA proposal with multiple phases and tasks for each phase is considered complex.

The exact boundary between high and low complexity proposals will be up to the fiscal staff, but as a general rule, proposals that involve subawards to other institutions or that require non-standard budget documents such as budget breakdowns by task should not be assumed to be low complexity proposals. Proposals from foreign sponsors will also generally be considered high-complexity because they require additional review by MIT.

## Key events and timelines

The CSAIL proposal submission policy is structured around four key milestones.

1. **Submission notification milestone.** PIs should notify their FO of their intent to submit a proposal as soon as possible. The submission notification should include the deadline, the call for proposals, and any additional information that is relevant to estimating the effort that will be required from the fiscal staff to successfully submit the proposal. The fiscal staff will use this information to determine whether this is a high-complexity or a low-complexity proposal.

**Deadline:** For high-complexity proposals, submission notification must happen at least 10 full business days before the RAS deadline. For low-complexity proposals, submission notification must happen at least 5 business days before the RAS deadline. Note that if you provide your notification between the two deadlines with the expectation that your proposal is low complexity and it is instead determined to be high-complexity, you will need to follow one of the processes under *exceptions and appeals*.

2. **Fiscal-relevant milestone.** By this milestone, the fiscal team should have all the information necessary to complete the budget and assemble the package that will be submitted to RAS. Changes that do not have to involve the fiscal staff can still happen after this milestone, but you want to avoid major changes that require the involvement of the fiscal staff after this milestone (see *exceptions and appeals*). For example, for a small NSF proposal, updating the technical volume to polish the description of a

proposed algorithm would be ok after this milestone, but adding a postdoc or changing the travel budget would not. Keep in mind that for some high-complexity proposals, even seemingly technical changes require work from the fiscal staff and must therefore happen before this milestone. For example, for some DARPA proposals, budgets must be broken down by tasks, so changes to the proposed work may require updating this breakdown and should therefore be avoided after this milestone.

**Deadline:** For high-complexity proposals, this milestone must be reached at least 5 full business days before the RAS deadline. For low-complexity proposals, this milestone must be reached at least 1 full business day before the RAS deadline.

3. **RAS Submission milestone.** By this milestone, the fiscal team must have all the documents that will be necessary to submit to RAS, including all COI certifications.

**Deadline.** The Fiscal team must have all the documents ready to submit to RAS, including all COI certifications by noon on the day of submission to RAS. The five day rule for RAS requires the package to be submitted to them by 5PM five business days before the sponsor deadline. If PIs want to make any changes to any document to be submitted to RAS after this point, they must request an exception as detailed below.

4. **Fiscal-relevant Post RAS milestone.** After RAS reviews the proposal, they usually require some updates. Some of the changes required by RAS may have Fiscal relevant impacts. Any such changes must be completed by this milestone. This also includes any documents that are required from other DLCs or from outside MIT.

**Deadline.** Any fiscal relevant changes prompted by a request from RAS must be completed at least 3 business days before the sponsor deadline. If RAS requests a change less than 3.5 days before the sponsor deadline, you should respond with these changes as soon as possible, but no later than the Final Post RAS milestone.

5. **Final Post RAS milestone.** By this milestone, the fiscal staff must have available to them all the documents necessary to submit the proposal. After this milestone, the fiscal staff can no longer accept updates to any documents. It is the sole responsibility of the PI to make sure that by this point all the documents are in their final form and ready to be submitted, and that every single document required for the submission is in the hands of the fiscal staff.

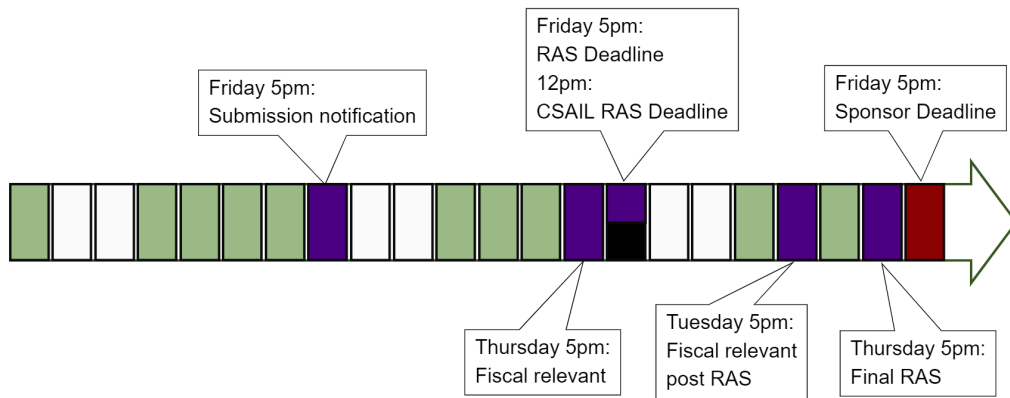
**Deadline.** The fiscal staff must have all documents ready to submit 8 business hours before the sponsor deadline. If the sponsor deadline is at noon on a Friday, this milestone will be at noon on Thursday.

**Additional information on deadlines.** For the purpose of these policies, a business day is from 9am to 5pm on a work day, Monday to Friday excluding institute holidays. Unplanned institute closures will be handled on a case-by-case basis. For example, we do not expect a standard snow-related closure to affect these deadlines, but it is impossible to anticipate every contingency. If a deadline is marked as 2 business days before a 5pm RAS deadline, it means the fiscal staff must have all the necessary materials no later than 9am on the previous day, but 2-days before a Friday noon sponsor deadline would be by noon on Wednesday.

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## Low complexity

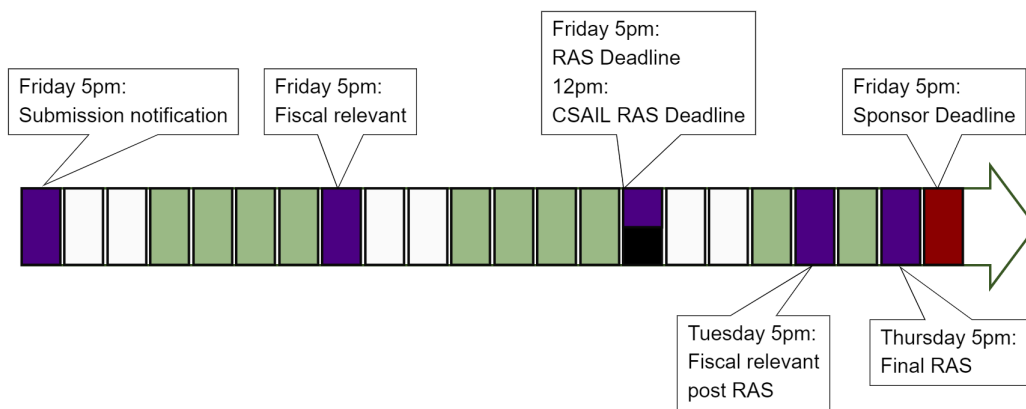
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## High complexity

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## Exceptions and appeals

Having PIs follow the timelines for every milestone in the proposal submission process will be key to the success of this effort. However, we recognize sometimes there is a need for flexibility, so our goal is to handle those situations in a fair and consistent manner.

- 1. Failure to meet the proposal notification milestone.** If you are unable to notify your FO by the proposal notification deadline, either because you learned of a funding opportunity too late, or because you expected the proposal to be classified as low complexity but it got classified as high complexity, you will fall under this category. If this is the first time this happens during the fiscal year, you can request an automatic waiver up to the deadline for the fiscal relevant milestone. If you have already used your automatic waiver for the fiscal year, or if it is already past the fiscal relevant milestone for your proposal category, you will need to request a waiver from the lab director. In granting the waiver, the lab director will aim to balance the needs of the PI with the capacity available within the fiscal staff. If the waiver is granted, the waiver may also include an updated Fiscal relevant milestone deadline.
- 2. Need to make changes to fiscal relevant information after the fiscal relevant milestone.** The fiscal staff will work to produce the necessary documents to submit a full proposal to RAS based on the information provided by the deadline for this milestone, so it is important that by this point the fiscal staff has enough information to begin this process. If you need to make changes to the fiscal relevant information after this milestone, you should let your FO/FC know right away. The fiscal staff will try to work with you to incorporate these changes into the submitted materials. However, if the fiscal staff have not received enough information to get started with their work by the beginning of this milestone, or if the requested changes are too big to complete by the RAS deadline, you may be asked to request a waiver from the RAS deadline.
- 3. Need to update any document related to the proposal after the RAS submission milestone before they are submitted to RAS.** The fiscal staff will prepare the submission package for RAS based on the documents that were submitted by the PIs by this deadline. If you need to update any documents after this deadline but before they are submitted to RAS, you will have to request a waiver from the 5-day RAS requirement which will have to be approved by the Dean and will count towards the limit imposed by the College of Computing. There will be no exceptions to this.
- 4. Changes need to be made to fiscal relevant documents after the Fiscal-relevant Post RAS milestone.** The fiscal staff will try to accommodate small adjustments (i.e. need to adjust the amount budgeted for travel in a low-complexity proposal), but changes that are deemed by the fiscal staff to require significant effort will require approval from the head of the lab.
- 5. No PI initiated changes will be allowed to any document after the Final Post RAS milestone.** In some cases, RAS or the fiscal staff may find at the last minute that there is some document or piece of information missing that is crucial to successfully completing the submission and may request this information/document from the PI, so PIs should be on the lookout for such last minute requests and respond to them promptly. However, part of the goal of our process overhaul is to prevent such things from happening. When such things happen, they will be treated as a failure of the process.

## **Pass-through agreements.**

In some special cases, PIs can request to have the ability to make last minute changes closer to the sponsor deadline in exchange for taking some of the responsibility for ensuring that the proposal is submitted correctly and on time.

For example, in the past, PIs who are experienced using fastlane have been able to enter documents directly into the system relatively close to the deadline without needing the fiscal staff to serve as an intermediary. We would like to preserve this ability when possible, but also avoid situations where many documents are changing in the final minutes before the sponsor deadline and the fiscal staff has to keep track of all these changes and serve as an intermediary with RAS while bearing with the full responsibility for the success of the proposal submission.

As part of the new policy, PIs can request a pass-through agreement where instead of having the fiscal staff fully handle the final submission of the proposal, the PI or their designated proxy would be responsible for most of the final submission process and would have some flexibility around the 8 hour deadline for the Final Post RAS milestone. Such an agreement would involve the following elements:

- The agreement would specify the sponsor or sponsors for which the agreement applies.
- The agreement would specify the person who will be responsible for final submission, which can be either the PI or a designated proxy who cannot be a graduate student, postdoc or administrative assistant.
- MIT policies require that proposal cannot be submitted without RAS approving the final materials, and the fiscal staff still need to play a role in entering the final materials into the MIT system in order for them to be approved, so even if the PI is in charge of the final submission, they will still have to follow agreed upon guidelines in order to get the approvals on time.
- PIs should also be aware that RAS still has the final word on any proposal submission, so they should keep RAS informed if they are making changes close to the deadline.
- If the PI intends to make use of this privilege for a particular proposal submission, the PI will have to notify their FO by e-mail before the Final Post RAS milestone.

PIs who are interested in exploring this option should reach out to the CSAIL AO well in advance of a proposal submission deadline to discuss further.