**Pre-Submission Review (Unit Research Administrators)**\*– These instructions are particularly relevant when the originating or immediate sponsor is the U.S. Government (USG) and the mechanism being used to fund the work will be a contract (rather than a grant or cooperative agreement) or is unknown when the proposal is submitted. Similar steps are recommended when requesting permission to access/use Controlled Unclassified Information (CUI)\*\* from the USG or other sources that have adopted USG standards, regardless whether the contract is funded or unfunded.

*Background information on the topics below and related issues, as well as suggested proposal language, is available on UVA’s CUI website (*[*https://research.virginia.edu/controlled-unclassified-information-cui*](https://research.virginia.edu/controlled-unclassified-information-cui)*). For IvyCUI pricing information visit the Research Computing website (*[*https://www.rc.virginia.edu/userinfo/pricing/*](https://www.rc.virginia.edu/userinfo/pricing/)*). Don’t forget to determine if developer or consultant services will be needed for the project as well and include that in the budget as well.*

1. Check the funding announcement for indications of CUI involvement and System Security Plan (SSP) requirements. *Note: This should be done in conjunction with a fundamental research determination (#2) so that both can be appropriately reflected in the cover letter, proposal, AND Statement of Work.*
   1. If CUI is indicated and an SSP, or elements thereof, is required to be submitted with the proposal,
      1. ensure that the SSP, or any elements thereof, was provided or approved by University Information Security; and
      2. budget includes costs for IvyCUI or development of a project specific system; or
   2. If CUI is indicated and an SSP, or elements thereof, is not required to be submitted with the proposal ensure either
      1. Proposal and Statement of Work clearly state there will be no involvement of CUI and add appropriate language to the cover letter; or
      2. The budget includes costs for IvyCUI or development of a project specific system.
   3. If CUI is not indicated either
      1. Return proposal to PI and request he/she add suggested language to the proposal and/or Statement of Work and then include appropriate language in the cover letter; or
      2. Make or request a determination regarding CUI involvement and include appropriate language in the cover letter.
   4. If time doesn’t permit review and assessment, proceed with submission but notify PI and state expectation of no CUI in cover letter with a request for prompt notice with the right to adjust proposed budget, if the sponsor disagrees with that assessment. *Note: This is the* ***least preferred*** *approach. Please make every effort to have the relevant discussion(s) with the PI to ensure that appropriate language is included in the proposal and/or Statement of Work.*
2. Does the proposal and/or Statement of Work specify whether or not the proposed work is fundamental research?
   1. If yes, verify that the determination seems reasonable and include appropriate language in the cover letter and Statement of Work; or
   2. If not, either
      1. Return proposal to PI and request he/she add suggested language in the proposal and/or Statement of Work and then include appropriate language to the cover letter; or
      2. Make or request a determination and include appropriate language in the cover letter
3. Complete the ePRF – the following data fields are related to CUI, as well as, fundamental research determinations and export control applicability assessments:
   1. Immediate Sponsor – additional issues will need to be addressed if this is a DoD agency
   2. Originating Sponsor – additional issues will need to be addressed if this is a DoD agency
   3. Export Control Question #2 – this question has been modified to align with “involvement” of CUI

*\*Note: OSP PreAward Administrators will perform additional checks if time permits prior to the submission deadline.*

*\*\*Note: The Department of Defense (DoD) uses the similar but somewhat broader term covered defense information (CDI).*