

NATIONAL SEA GRANT COLLEGE PROGRAM

NATIONAL COMPETITION POLICY

PROCEDURES FOR THE SOLICITATION, REVIEW, AND APPROVAL OF COMPETITIVE PROPOSALS BY THE SEA GRANT PROGRAMS

The National Sea Grant Office (NSGO) has delegated to the Sea Grant programs the primary responsibility for planning, evaluation, and selection of competitive projects. This NSGO policy provides standardized procedures for peer review of competitive proposals (Sea Grant legislation section 1123(c)(2))[i] based on those outlined in the Department of Commerce Grants Manual [ii] (chapter 8) for reviewing, selecting, approving, and notifying applicants of funding decisions. The NSGO's intent is to outline a clear competition policy that ensures compliance with federal review processes and generates research, education, and outreach projects of high quality, while reducing the time and effort required to process proposals.

This document provides standard procedures that the Sea Grant programs must implement for evaluating and selecting proposals subject to competition, whether research, education, or extension work. Non-competitive projects to be included in federal funding award applications are not subject to this policy, but may be subject to a merit review. Refer to any related federal funding opportunity for more information on merit review requirements.

The NSGO has established six primary processes that each Sea Grant program must establish for selecting competitive projects -- (1) strategic planning, (2) request for proposals, (3) pre-proposal (if applicable) (4) written external peer review, (5) panel review (if applicable), and (6) proposal selection criteria. At the completion of the competitive process, the program will be required to develop a memo outlining recommended projects for funding (Letter of Intent). These processes help ensure that strategic planning reflects state priorities as determined by broad constituency participation, that proposal selection reflects strategic plans, and that proposal selection is fair and clearly understood by participants and potential applicants.

The entire competitive process should be free from conflict of interest as defined by the NOAA Conflict of Interest (COI) policy [iii]. Per the NOAA policy, the term "conflict of interest" means any financial or other interest which conflicts with the service of the individual in the review because it (1) could significantly impair the individual's objectivity or (2) could create an unfair competitive advantage for any person or organization. It is also Sea Grant policy that the process be free from the *perception* of conflict of interest.

The Sea Grant Research Coordinators Network has developed recommendations and best management practices on how to execute this policy. Please refer to the the following document for this guidance: Sea Grant Research Coordinators: Best Practices For Running Competitions (available on [Inside Sea Grant-Implementation page](#))

Strategic Planning

The Sea Grant programs are required to use an external advisory and planning process, broadly involving representatives of relevant industries, government, NGS, academia, and the public, to develop a strategic plan that is compatible with Sea Grant's national strategic plan. The plans are expected to set priorities, define opportunities, and align state/local needs and opportunities with national needs and opportunities. Policies and procedures for developing a strategic plan can be found on the [Inside Sea Grant-Planning page](#).

Request for Proposals

The Sea Grant programs must develop a request for proposals (RFP) consistent with the program's strategic plan. The RFP must include:

- Information on the proposal format, required materials, and applicant eligibility.
- An outline of the evaluation method for proposals. This outline includes clearly describing: the evaluation criteria used by reviewers to evaluate the proposals at each step of the competitive process (including evaluation criteria for pre-proposal review, if applicable), the review process, and a description of how the Sea Grant program will determine final recommendations for selection.
- A requirement that proposals recommended for funding must: have a valid data management plan (or alternative statement if no data management plan is needed), as well as a completed Abbreviated Environmental Compliance Questionnaire (and copies of associated permits, if applicable). These documents and associated guidance can be found on the [Inside Sea Grant-Implementation page](#).

The RFP must be sent to the assigned NSGO program officer for concurrence *prior* to publication and distribution. The NSGO program officer is expected to respond with written concurrence within ten business days of receiving the RFP.

The Sea Grant programs must share explicit guidelines for preparation and submission of full proposals. If this guidance is developed as a separate document from the initial RFP, it must also adhere to the RFP requirements, including review by the NSGO program officer *at the time of the initial RFP review*.

The RFP must be distributed widely to individuals and unit heads at all institutions of higher learning and other research institutions, within that state or region, with relevant research or educational capability.

The National Sea Grant College Program champions diversity, equity, and inclusion by recruiting, retaining, and preparing a diverse workforce, and proactively engaging and serving the diverse populations of coastal communities. Sea Grant is committed to building inclusive research, extension, communication, and education programs that serve people with unique backgrounds, circumstances, needs, perspectives, and ways of thinking. Sea Grant programs should encourage proposals that include

diverse participants with regards to age, race, ethnicities, national origins, gender identities, sexual orientations, disabilities, cultures, religions, citizenship types, marital statuses, education levels, job classifications, veteran status types, income, and socioeconomic status.

Pre-proposal (if applicable)

For competition processes with potentially large applicant pools, many Sea Grant programs use a pre-proposal stage. As outlined in the Department of Commerce Grants Manual[ii], utilizing a pre-proposal process can assist potential applicants by giving them realistic feedback on whether their project ideas and proposal aligns with the goals and objectives of a particular program, and provide feedback to strengthen the proposal. Such pre-proposal review is intended to allow applicants to avoid incurring significant expenditures in preparing proposals that are not consistent with Sea Grant program goals and objectives.

The format, length, and content requirement of the pre-proposal should be determined by the Sea Grant program to meet their needs for this stage of the review process. For some solicitations, requesting a short project summary (commonly referred to as a letter of intent) may be more appropriate and still allow the program to begin planning review in advance, and/or helps to mitigate short timeframes when conducting a multi-step competition.

If the program intends to use the pre-proposal stage to encourage or discourage proposals, then the Sea Grant program must devise a system that scores, ranks, or categorizes the pre-proposals. The process must be free from conflict of interest, and each applicant must be informed of the evaluation outcome. The RFP must clearly outline this evaluation process. The Sea Grant program may encourage or discourage investigators to develop full proposals, but *are required* to permit all applicants that submitted a pre-proposal to submit to the full proposal process. Full proposal guidance must be made available in the same manner to all applicants who submit a pre-proposal and are therefore eligible to submit a full proposal.

Written External Peer Review

Peer review is the responsibility of the administering Sea Grant program, and the review process must be entirely external to the Sea Grant program (i.e., Sea Grant staff from the administering program may not provide peer review). Oversight of the peer review process is the responsibility of the NSGO. This division of responsibilities for peer review follows recommendations of the National Research Council.[iv]

The statements below outline principles, responsibilities, and requirements that standardize the written peer review process, and help ensure the highest quality projects through engagement of a national community of peers.

- Each fully developed proposal must receive a minimum of three written, external peer reviews. Written review provided by review panelists may count towards this requirement.
- Selection of peer reviewers must be free of conflict of interest.
- All peer reviewers must provide signed statements certifying no conflict of interest with the applications they are reviewing.
- Sea Grant programs should make special efforts to ensure that individuals of underrepresented groups are appropriately included among peer reviewers.
- The criteria for written peer review must be clearly described in the RFP so applicants know and understand how their proposals will be evaluated. The criteria cannot be changed or elaborated upon when provided to peer reviewers.
- Letters of support from potential end-users of the proposed research may also be submitted with proposals, if allowable per the RFP, but they do not substitute for external peer review.

Review Panel

The Sea Grant program should use one or more review panel(s) capable of interpreting written external peer reviews within the specialized fields of the proposals under consideration, and the review process must be entirely external to the Sea Grant program (i.e., Sea Grant staff from the administering program may not serve as panel reviewers). These requirements apply to all review panels, laid out as part of the competitive process in the RFP, that provide input to the final decision for recommendation of funding. The purpose of the panel is to evaluate proposals on the basis of overall quality and individually advise the Sea Grant program on which proposal should be considered for funding.

- Review panels can include members that served as written external peer reviewers. This may serve to reduce the burden of finding additional reviewers.
- Review panels are expected to operate by procedures that are free of conflict of interest. In order to enhance the intellectual rigor and innovativeness of our panels and reduce the impact of disciplinary or other biases on the long-term research of a program, we require that programs use review panels tailored to each competition. The same reviewers should not participate in panels for the same program on a regular basis.
- All panelists must provide signed statements certifying no conflict of interest with the applications they are reviewing.
- Sea Grant programs should make special efforts to ensure that individuals of underrepresented groups are appropriately included among panelists.
- Sea Grant programs must notify the NSGO program officer of each panel they intend to hold related to the competition. The panel dates must be planned in coordination with, and approved by the NSGO program officer prior to the date(s) being set. The FPO may attend, at their discretion.
- Scores assigned by the panelists must be based upon evaluation criteria described in the RFP, which must be clearly communicated to all panelists. Scores can be numeric or descriptive.

- The panel must make a final determination on the fundability of each individual proposal (i.e., fundable or not fundable). Any project deemed ‘unfundable’ cannot be recommended for funding by the program, even if future funds are made available.
- In the event that the review panel(s) or external peer reviewer comments recommend a reduction in scope and/or budget for the project, that rationale needs to be documented by the Sea Grant program and included in the Letter of Intent (see Letter of Intent section below). Subsequently, the applicant will be asked to include an addendum to the original proposal outlining the revised work plan and budget, as applicable.
- Periodically, the NSGO will audit the review process executed by each Sea Grant program, and recommend or require changes or improvements if needed. The quality of a program’s competitive process and corresponding record-keeping may affect federal funding for the program.

It is often useful to convene one or more review panels to synthesize the results of the written peer reviews, and help the Sea Grant program determine which proposals are fundable. Using a panel(s) is the default plan for all competitions, though there are reasons given below for why it may not be needed in all cases. If the Sea Grant program believes a competition may not require a review panel, they must obtain approval from their NSGO program officer, and clearly describe the process in the RFP. A review panel may not be necessary when, for example (i) a small number of proposals is anticipated, (ii) external review is conducted by the same reviewers for all submitted proposals, and/or (iii) there is a narrow topical focus of the competition, such that further review/synthesis beyond the written peer reviews is not helpful.

Proposal Selection Criteria

The Sea Grant program must establish selection criteria to determine the final list of applicants to be recommended for funding to the NSGO. Selection criteria provides flexibility to select out of rank order, if needed, but the selection criteria *must* be clearly described in the RFP and free from conflict of interest. If the program does not define selection criteria in the RFP, then the panel ranking and recommendations must be used to determine final selection (or written reviews if the NSGO program officer approves a panel will not be used).

Proposal Recommendations and Letter of Intent

Following the review, the Sea Grant program may determine final proposal recommendations based on the evaluation and selection criteria listed in the RFP. Before notifying applicants of the outcome, the Sea Grant program must seek concurrence of the program’s intended decisions and corresponding rationale by submitting a Letter of Intent (LOI) via email to the NSGO program officer. The Sea Grant program’s LOI should include the following:

- A list of all proposals submitted with their principal investigators' names and affiliations.

- Proposals with an aquaculture topical focus area should be identified in the list of projects, as these are tracked separately by NSGO as part of our ongoing National Strategic Investment in aquaculture.
- The name, professional affiliation, and contact information (email address) of all panelists, or written reviewers if panelists are not used.
- Score assigned by the panelists to each full proposal (this can be numeric or descriptive).
- Determination of fundability (i.e., fundable or not fundable) for all proposals submitted to the program.
- The list of projects recommended for funding at this time, including a summary of the rationale for funding decisions.
- An explanation of why any proposals were selected out of rank order based on the selection criteria as described in the RFP (if applicable).

The NSGO program officer is expected to review the LOI within approximately ten business days. The program officer will review this LOI in the context of ensuring that a fair and open process was followed to reach the decisions. This review is not intended to influence programmatic decisions on individual projects. If, after discussion with the Sea Grant program, there are issues related to the fairness and openness of the review process that cannot be resolved, the director of the National Sea Grant College Program will make the final funding recommendation. Upon final review, the NSGO program officer will provide a signed concurrence letter via email.

After NSGO concurrence is received, the Sea Grant program may notify all applicants of the recommendation regarding their proposals in writing. Anonymous copies of the corresponding reviews and a statement outlining the funding decision must accompany this notification. Sea Grant programs may only inform applicants that the proposal is being recommended, as selection decisions are not finalized until signed by the NOAA Grants Management Division. Projects may not be announced publicly until the award action has been accepted at the host institution.

The Sea Grant program must submit the recommended proposals for approval to the NOAA Grants Management Division through the Grants Online system. Proposals will either be included with program application materials for new federal financial awards, or submitted to existing awards using an Award Action Request to satisfy the Specific Award Conditions for the appropriate Future Competed Placeholder project. Sea Grant programs must include the entire proposal package for each recommended project (including project narratives, budget forms and budget justifications, data management plan, a completed Abbreviated Environmental Compliance Questionnaire and any necessary permits). The programs should *not* include the LOI and concurrence letter from the NSGO program officer (the program officer will upload those directly as internal documents to the grant file).

Record-keeping

Records of the proposal and decision-making process are necessary for any subsequent evaluations of the process. These records, which must be maintained for three years from the submission of the final expense report of the corresponding award (2 CFR § 200.333), shall be made available to the NOAA or NSGO upon request, and include the following:

- A copy of the RFP and the distribution list for the RFP.
- List of titles, principal investigators, and institutional affiliations of all pre-proposals and proposals received in response to RFP.
- Complete copies of all written external peer reviews.
- List of names, professional affiliations, and contact information (email address) for each written peer reviewer and review panelist, with a list of proposals assigned to each reviewer.
- Signed statements certifying no conflict of interest for all written peer reviewers and review panelists.
- A copy of the LOI, which summarizes the review panel process and rationale for recommendations, and the concurrence letter from the NSGO program officer.

[i] National Sea Grant College Program Act of 1966, as amended (33 USC § 1121 et seq.)

[ii] [The Department of Commerce Grants and Cooperative Agreements Manual](#) 25 January 2018. Section 7. (Types of Applications), Subsection A. (Pre-Applications); p. 39

[iii] [National Oceanic and Atmospheric Administration Policy on Conflict of Interest For Peer Review Subject to OMB's Peer Review Bulletin](#)

[iv] Ocean studies Board, National Research Council, 1994. A Review of NOAA National Sea Grant College Program, National Academy Press, Washington, p. 3.

This policy replaces the following documents:

- *RFP Policy (PDF, Last updated September 2018)*
- *FY2020-21 TRP Considerations and Timeline (PDF, Last updated August 2019)*
- *Program Core Funding: Procedures, Solicitation, Review and Approval of Proposals (1998)*