Welcome

Marcia Smith
Associate Vice Chancellor for Research
Agenda

- Welcome and Announcements – Marcia Smith
- EFM Initiatives Update – Tracey Robertson
  - Encumbrances
- OCGA Initiatives – Patti Manheim, Kim Duiker
  - Proposal Intake Team Update
  - EPASS Updates, including Proposal Submission and PHS COI Policy
- Research Policy and Compliance Updates
  – Ann Pollack, Raffi Simonian, Allison Philabaum
  - UCLA PHS COI Policy
  - UCLA eDGE Launch
- Accounts Payable Update – Ian Da Costa
- Questions and Discussion
- ENJOY THE ALL-STAFF PICNIC !!
Transition of Huron Team Members

- Huron team members will be transitioning out of ORA at the end of this month
  - RAPID projects supported by Huron team members are being transitioned to ORA and campus project team members
  - Jenna, Tracey and Allison are reaching out to work group members to ensure successful hand-off of ongoing tasks

- The Huron team has helped us build tremendous momentum under the RAPID initiative, and they have made great contributions to our projects

- Thanks go to Jenna Lee, Tracey Robertson, Allison Philabaum and Nate Haines for the excellent work they have done in support of the campus research administration infrastructure
Some RAPID Successes

- We can take great pride in our RAPID achievements to date, including but not limited to:

  - Successful campus-wide response to ARRA proposal, award, compliance and reporting requirements
  - Improvements in ERS and campus-wide effort certification compliance metrics
  - Campus-wide roll-out of the automated RAPID Fund Close-Out Tool
  - Implementation and campus-wide roll-out of webIRB and the new business processes underlying that system
  - Development and campus-wide deployment of the award-winning PI Portal
  - Successful implementation of Proposal and Award Tracking System (PATS) and new OCGA business processes
  - Improvements in ORA organizational structure, and performance improvements in every ORA unit, with comprehensive metrics to enable continuous performance improvement
RAPID Work Continues

• ORA and campus partners will continue to implement efficient and effective business processes, deliver elegant technology tools, and further improve service to faculty

• Ongoing RAPID work includes:
  ▪ Proposal Development and Proposal Submission (PDPS) work group
  ▪ Leadership Involvement and Procedure Enforcement (LIPE) work group
  ▪ Enhancements to Award Status and Snapshot Report and development of Proposal Query/Report for ORA Portal
  ▪ PI Portal enhancements – My Proposals, My Deliverables…
  ▪ Post Award Management System (PAMS) development and deployment
  ▪ Training Grant Working Group
  ▪ Improved transaction communications to campus
  ▪ And more…. 
EFM Agenda

- Encumbrances
To Appears:
The process of including costs that have not posted to the GL in an interim or final financial report to the sponsor but will appear at some future date.
  • *No longer allowed or approved by EFM*

Encumbrances:
The act of including costs that have not hit the GL but approved documentation is submitted to EFM to include said costs on the interim or final financial report.
### Example—Annual Financial Report

<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>06/30/12</td>
<td>• Budget period ends</td>
</tr>
</tbody>
</table>
| 09/07/12   | • EFM worklist includes financial report due 09/30/12. **Reminder:** Close-out packets no longer required for annual financial reports.  
  • EFM begins preparation of annual financial report based on 6/30/12 ledger |
| 09/15/12   | • EFM e-mails complete annual financial report to dept. fund manager based on 6/30/12 GL  
  • Dept. has 5 days to respond if additional costs incurred in July and August are to be added to the financial report. |
| 09/20/12   | • Dept. responds to EFM.  
  • If charges are to be included for September which are not yet on the ledger then departments must submit documentation (see upcoming slide for acceptable documentation). |
| 09/30/12   | • If dept. does not respond within the 5 days, then EFM will submit the annual financial report based off the 6/30/12 GL.  
  • EFM submits annual financial report to sponsor. |

*Assumes no carry-forward allowed or restricted carry-forward. If carry-forward automatic EFM reports directly from GL.*
Example—Final Financial Report

06/30/12
- Budget period ends
- 90/30/0 e-mail notifications go to dept. administrator and Pis
- Depts. begin working on COP

09/01/12
- If EFM has not received the COP by the 60 day deadline (for a 90 day report) then EFM will follow-up with dept. on the status of the COP.
- Follow-up continues until COP received by EFM.

09/30/12
- COP is submitted to EFM and EFM reviews the packet.
- If dept. is requesting encumbrances to be included in the final financial report, acceptable supporting documentation must be submitted to EFM (see next slide).
- Final financial report submitted to sponsor by EFM.
Acceptable Documentation

**Invoices**
- Copy of invoice from Vendor or subcontractee
- BruinBuy generated invoice

**Payroll**
- UPAY documentation (list of approved UPAYS from the web-based expense transfer system)

**Transfers**
- NPEAR documentation (list of approved NPEAR that haven’t posted to the GL)
Questions or Comments

Please send any questions or comments to:

rapidfeedback@research.ucla.edu
Today's Topics

- Proposal Intake
- EPASS – Updates (PHS COI Regulations)
Streamlining Proposal Process

- **Proposal Intake and Processing**
  - Average of 426 proposals submissions/month
  - 76% of proposals received within 2-3 days of the sponsor deadline every month.
Proposal Intake Process:

- Proposal Intake Team staff will receive all proposal applications. Initial review to confirm at least minimum documents are included.
- Standard Communications at key points in the process
- Proposal Intake Team will capture reliable data
- Systematic reminders will be issued to follow-up on missing documents
## Streamlining Proposal Process

<table>
<thead>
<tr>
<th>Minimum Requirements for Review</th>
<th>Requirements for Review, Approval &amp; Submission</th>
</tr>
</thead>
<tbody>
<tr>
<td>Completed EPASS with <strong>PI Signature</strong></td>
<td>Completed EPASS with all required signatures</td>
</tr>
<tr>
<td>Sponsor Guidelines</td>
<td>Sponsor Guidelines</td>
</tr>
<tr>
<td>All Sponsor forms requiring OCGA signature</td>
<td>Final Proposal (budget, science, agency required signatures, biosketches, etc.)</td>
</tr>
<tr>
<td>Final Budget with Budget Justification</td>
<td>Subaward Documents (if applicable)</td>
</tr>
<tr>
<td>Brief description of the proposal aims or proposal abstract</td>
<td>PI Exception Letter (if applicable)</td>
</tr>
<tr>
<td>Subaward Documents (if applicable)</td>
<td>Signed/Completed COI forms (if applicable)</td>
</tr>
</tbody>
</table>
Streamlining Proposal Process

Benefits:

- Single point of contact
- Compliance with sponsor guidelines
- Compliance with UCLA/UCOP policies
- Expedite award process
  - Currently ~$10 million in FY12 awards are on hold due to missing 740s and Golden Rods – need updated #s
- Report back to campus on key departmental metrics regarding proposal submission
Extramural Proposal Approval and Submission Summary “EPASS”

- Effective **Monday, June 18**
- Goldenrods still accepted but we will also need an unsigned EPASS
- Beginning September 1, the EPASS **will be mandatory**
EPASS Updates

• Section 2. Affiliated with Center/ORU changed from free text field to drop-down list:
  ▪ California Nanosystems Institute (CNSI)
  ▪ Clinical & Translational Science Institute (CTSI)
  ▪ Ctr for Embedded Networked Sensing (CENS)
  ▪ Ctr for Nanoscale Innovation for Defense (CNID)
  ▪ Ctr for Scalable & Integrated Manufacturing (SINAM)
  ▪ Ctr on Functional Engineered Architectonics (FENA)
  ▪ Institute for Digital Research & Education (IDRE)
  ▪ Institute for Pure and Applied Mathematics (IPAM)
  ▪ Joint Inst. for Reg Earth Sys Sci & Eng (JIFRESSE)
  ▪ Jonsson Cancer Center (JCC)
  ▪ Other Center/Institute
  ▪ Western Institute for Nanotechnology (WIN)
EPASS Updates

• Section 6. Delete “Biohazard” question
• Section 6. Revised “Biological Materials” question:
  ▪ replaced “If yes, EH&S Biosafety Officer must sign in Approvals section below”
  ▪ with “For more information, see Biological Safety Division website.”
EPASS Updates

• Section 10. Signature options changed from free text field to drop-down list:
  ▪ Other Principal Investigator or Co-PI
  ▪ Chair
  ▪ ORU Director
  ▪ Dean
  ▪ Medical Center Director
  ▪ CAO
  ▪ MSO
  ▪ DRA
  ▪ Other
EPASS Updates

• Section 7 and page 3. Revise current language to read “Sponsor/Prime Sponsor is Federal Public Health Service (PHS) or agency that has adopted the PHS regulations?”
  ▪ Hyperlink to a list maintained on the RPC website rather than updating the EPASS to add agencies/sponsors
EPASS Updates

Instructions

• Section 10: Approvals
  - In accordance with UC Policy, the following required certifications and assurances are made upon signature or submission of the EPASS by: Principal Investigators (PIs) and Co-PIs; Department Chairs, Unit Heads or Deans; other signators as required.
  - **NOTE:** The PI/CoPI signature(s) on the EPASS incorporate required PHS certifications. A separate NIH/PHS PI Signature Form is not required.
EPASS Certifications

Amended Federal Regulation

- Public Health Service (PHS) regulations on
  - Responsibility of Applicants for Promoting Objectivity in Research for which PHS Funding is Sought (42 C.F.R. Part 50, Subpart F), and
  - Responsible Prospective Contractors (45 C.F.R. Part 94).

- Applies to proposals submitted on/after August 24, 2012.
EPASS Certifications

• Specifically Paragraph 50.604 (e)(1) [Each Institute shall] Require that each Investigator who is planning to participate in the PHS-funded research disclose to the Institution’s designated official(s) the Investigator's significant financial interests (and those of the Investigator’s spouse and dependant children) no later than the time of application for PHS-funded research.
EPASS Certifications

PHS Objectivity Policy

...disclosures shall be made “...no later than the time of application for PHS-funded research.”
14. APPLICANT ORGANIZATION CERTIFICATION AND ACCEPTANCE: I certify that the statements herein are true, complete and accurate to the best of my knowledge, and accept the obligation to comply with Public Health Services terms and conditions if a grant is awarded as a result of this application. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties.
APPLICANT ORGANIZATION CERTIFICATION

AND ACCEPTANCE: I certify that the statements herein are true, complete and accurate to the best of my knowledge, and that I will comply with all terms and conditions if a grant is awarded as a result of this application. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties.

EPASS Certifications

I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties.
EPASS Certifications

SF 424 Certification Instruction

17. CERTIFICATION: Check “I agree” to provide the required certifications and assurances. This field is required. The list of NIH and other PHS agencies Assurances, Certifications, and other Policies is found in Part III, Policies, Assurances, Definitions, and Other Information.

The applicant organization is responsible for verifying its eligibility and the accuracy, validity, and conformity with the most current institutional guidelines of all the administrative, fiscal, and scientific information in the application, including the Facilities and Administrative rate.

Deliberate withholding, falsification, or misrepresentation of information could result in administrative actions, such as withdrawal of an application, suspension and/or termination of an award, debarment of individuals, as well as possible criminal penalties. The signer further certifies that the applicant organization will be accountable both for the appropriate use of any funds awarded and for the performance of the grant-supported project or activities resulting from this application. The grantee institution may be liable for the reimbursement of funds associated with any inappropriate or fraudulent conduct of the project activity.
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17. By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the requirements assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)
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EPASS Certifications

UCLA PHS Objectivity Policy

...disclosures shall be made “before proposal submission.”
EPASS Certifications

OCGA Proposal

• In extreme circumstances, disclosure within 24 hours and we reserve the right to withdraw the application.
• Not a requirement of the Institution, but a PHS requirement for eligibility for PHS funding.
QUESTIONS?
Research Administrators Forum

Ann Pollack
Assistant Vice Chancellor – Research

Allison Philabaum
Huron Consulting

Raffi Simonian
Project Manager, ORIS

August 9, 2012
Implementation at UCLA

- Applies to research supported by the National Institutes of Health and other PHS agencies
- Also applies to research supported by non-profits that have adopted the PHS COI regulations
- UCLA Policy 926 will be issued to implement the PHS regulations
Applies to:

• All PHS proposals that are submitted on or after August 24, 2012 are subject to these regulations
• The regulations also apply to all awards issued on or after August 24, 2012
• Awards that are ongoing as of August 24, 2012 will become subject to the revised regulations when additional funds are requested through submission of a progress report, application for supplemental funding or request for no-cost extension
Disclosures

• The regulations require that investigators disclose Significant SFIs:
  ▪ Those that *meet the definition of SFI*, and
  ▪ Are *related to the investigator’s institutional responsibilities*

• “For the purposes of this policy, the term institutional responsibilities is defined as “teaching/education, research, outreach, clinical service, and University and public service on behalf of the University of California which are in the course and scope of the Investigator’s UC appointment/employment” *(UC and UCLA definition)*

• Disclosures will be made via the electronic Disclosure Gateway (eDGE)

• By law, the PI and other Investigators must disclose their significant financial interests (as defined under the regulations) to UCLA *before a proposal can be submitted*
Disclosures are Required for:

- All research awards, including some types of projects that previously did not require disclosure, such as conference, equipment or training grants.
- To determine if a project requires disclosures, see the Activity Codes, and descriptions of funding found at [http://grants.nih.gov/grants/funding/ac_search_results.htm](http://grants.nih.gov/grants/funding/ac_search_results.htm).
- Disclosure is required for projects with a D, F, K, L, M, P, R, S, or T prefix
- Disclosure required for many, but not all, with a U prefix
- Disclosure probably not required for a C, G, H, I, V, or X prefix, unless UCLA is a subrecipient conducting a research component
- Contact RPC if you are unable to determine if disclosure is required
UCLA Reviews

• Requires that UCLA engage in a two-step review of disclosed financial interests to determine:

  ▪ if any disclosed significant financial interest is related to the PHS-funded research (could be affected by the research or is in an entity whose financial interest could be affected by the research), and then

  ▪ if any disclosed significant financial interest constitutes a financial conflict of interest (a significant financial interest that could directly and significantly affect the design, conduct, or reporting of PHS-funded research)
Electronic Disclosure Gateway (eEDGE)

- Demonstration
- Contact RPC with Questions:
  - eEDGE Help Desk – 310-206-8546