OCGA Updates

Patti Manheim, Director
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August 9, 2012
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 <strong>all required signatures</strong></td>
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<tr>
<td>Sponsor Guidelines</td>
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<tr>
<td>All Sponsor forms requiring OCGA signature</td>
<td>Final Proposal (budget, science, agency required signatures, biosketches, etc.)</td>
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<tr>
<td>Final Budget with Budget Justification</td>
<td>Subaward Documents (if applicable)</td>
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<td>Brief description of the proposal aims or proposal abstract</td>
<td>PI Exception Letter (if applicable)</td>
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<td>Subaward Documents (if applicable)</td>
<td>Signed/Completed COI forms (if applicable)</td>
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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.
14. 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 am fully and directly responsible for 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.

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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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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.
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?