Agenda

- Welcome and Announcements
  - Marcia Smith
- Research Policy and Compliance Update
  - Ann Pollack
- OHRPP Update: webIRB Enhancements
  - Michele Leonard, (ORIS)
- XTrain Requirements for NIH Training Grants
  - Jennifer Aguilar (EFM), Cindy Gilbert (OCGA), David Jaquez (Pathology/Lab. Med)
- Allowable Direct Costing
  - Paula Dion (EFM), Cindy Gilbert (OCGA), William Paja (EFM)
- Automated Notifications of Close-Outs
  - Linda Finley (EFM), Barbara Harris-Holdrege (OCGA)
Research Administrators Forum

Introduction of the EFM Assistant Directors

Nate Haines
Interim Director
Post Award
Extramural Fund Management (EFM)

### Part Time Employees

<table>
<thead>
<tr>
<th>Name</th>
<th>Team Assignment</th>
<th>Days per Week</th>
<th>Schedule</th>
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</thead>
<tbody>
<tr>
<td>Vicki Lin</td>
<td>Clinical Trials</td>
<td>2 Days/Week</td>
<td>7AM-4PM on M, Fr</td>
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<tr>
<td>Sarah Roland</td>
<td>Refund Processing,</td>
<td>2 Days/Week</td>
<td>Tu, Th; 8 Hour/Week</td>
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<tr>
<td></td>
<td>Records Management</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jonathan Mandanichi</td>
<td>IPAS</td>
<td>3 Days/Week</td>
<td>10AM-3PM on Tu, W, Fr</td>
</tr>
<tr>
<td>Bayan Sadighi</td>
<td>IPAS</td>
<td>2 Days/Week</td>
<td>10AM-3 PM on M, Th</td>
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### Student Workers

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<thead>
<tr>
<th>Name</th>
<th>Team Assignment</th>
<th>Hours per Week</th>
</tr>
</thead>
<tbody>
<tr>
<td>Trevor Beritto</td>
<td>Records Management</td>
<td>3 Hours/Week; Hours to increase once Summer School is out</td>
</tr>
<tr>
<td>Josh Finley</td>
<td>ERS, Records Management</td>
<td>6 Hours/Week</td>
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<tr>
<td>Judy Ye</td>
<td>Private Team</td>
<td>9 Hours/Week until 7/29/10; hours to resume in October</td>
</tr>
<tr>
<td>Travis Tran</td>
<td>Private Team</td>
<td>12 Hours/Week</td>
</tr>
<tr>
<td>Stephanie Sosa</td>
<td>LOC</td>
<td>19 Hours/Week; Hours to decrease to 12 Hours/Week once 2nd Summer Session starts</td>
</tr>
<tr>
<td>Robin Kim</td>
<td>LOC</td>
<td>17 Hours/Week</td>
</tr>
<tr>
<td>Margarita Peralta</td>
<td>Federal Team</td>
<td>12 Hours/Week</td>
</tr>
<tr>
<td>Gabrielle Lebayan</td>
<td>Federal Team</td>
<td>12 Hours/Week</td>
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Research Policy & Compliance

Ann Pollack
Assistant Vice Chancellor – Research
January 13, 2011
NSF RCR Requirement - Review

- UCLA required to implement a plan for delivery of training and to ensure compliance.
- Individual proposals do not need to include plan details.
NSF Responsible Conduct of Research (RCR) Training Requirement - **Update**

- Award Synopses for NSF grants include notification of the RCR requirement.

- The NSF RCR core course is now available to employees through the UC Learning Management System (LMS).

- The same course will be posted on the CITI site for access by students*.

*COMING SOON
RCR Course Access for Employees

- Regular UCLA employees (faculty and staff) subject to this requirement will receive electronic notification of the course via LMS.
- Student and postdocs employed on NSF grants will receive individual e-mail notification and instructions about accessing the course via the LMS catalog.
- Other regular employees (not supported by NSF awards) may voluntarily access the NSF RCR core course through the UC Learning Center catalog.
Welcome to the UC Learning Center

The UC Learning Center is a learning management system (LMS) which enables online registration and tracking of courses, as well as hosting of eLearning. To learn more about this new system, please review the Help Guide (PDF).

Important: All UCLA employees should go to their profile and select their manager to enable manager notifications.

Instructions: Selecting Your Manager (PDF) Demo: Selecting Your Manager
Help Guide Supplement for Managers and Enrollees (PDF)

To access your required training (e.g. Sexual Harassment Prevention, UC Ethical Values and Conduct):
Select Assess > Training Analysis from the menu bar above. See also: UCOP Online Course Usage Tips.

Catalog

Access course here:

Academic Policy and Practices
- Academic Personnel
- Graduate Education

Business and Operations
- Business Systems
- Financial Management
- Personnel and Payroll

Career and Professional Development
- Career Management
- Professional Development

Communication

Department-Specific
- External Affairs

Environment, Health, and Safety
- Emergency Preparedness and Response
- Environmental Protection and Sustainability
- General Workplace Safety
- Hazardous Materials
- Laboratory and Research Safety
- Safety Management
- Vehicle and Equipment Safety

Research Administration and Practices
- Clinical Trials
- Research Administration

Supervision, Management, and Leadership
- Management Development

Technology and Software
- UC Essentials
- Ethics
- New Employee Orientation
- Retirement Planning
- Sexual Harassment Prevention

UCLA Health System
- All Staff Training & Development
- Department-Specific Training
- Information Systems Training
- Leadership Development
- Nursing Education
- Patient Experience Training
- Physician Education

Work Life and Wellness
RCR Course Access for Students Receiving Stipends

- Process still being finalized.
Contacts for Questions

- Ann Pollack, Assistant Vice Chancellor – Research at apollack@research.ucla.edu or x40387.
- Chelsea Cochrane, Sr. Policy Analyst, at ccochrane@research.ucla.edu or x40390.
webIRB Update

1/13/2011
webIRB Update

Phase 1
Apr 2008 – Jan 2010 -------Development

Phase 2
Jan 2010 – Feb 2011 -------Enhancement

Phase 3
Feb 2011 – Apr 2011 ----Vendor Upgrade

Phase 4
Apr 2011 – Ongoing --------Maintenance
webIRB Update

Key Enhancements January 2011 Deployment

- Study Application Questions/Guidance (57)
- Amendment Form Including PARs (4)
- PAR Smartform Overhaul (2)
- Added Information to Correspondence (19)
- Workflow Enhancements Affecting Study Teams (6)
- Other – Enhancements Affecting Staff/Committees and Administrative (53)
webIRB Update

PHASE 2 SUMMARY (January 2010 – Present):

- Number of Enhancements: 334
- Time Spent:
  - ORIS Development: 1055 Hours
  - OHRPP Leadership and Functional Team:
    - Review Feedback from Research Community
    - Specification of Changes
webIRB Update

Number of Enhancements by Type

- OHRPP
- Study Team
- Site Admin

Timeline:
- February
- March
- April
- May
- August
- January

Number of Enhancements:
- 0 to 90
NIH xTrain
An eRA Commons Module for Managing Training and Fellowship Grants

Jennifer Aguilar, EFM
Cindy Gilbert, OCGA
David Jaquez, Department of Pathology and Laboratory Medicine

Research Administrators Forum
January 13, 2011
What is xTrain and Who Needs to Use It?

xTrain is a feature in the NIH eRA Commons that allows PD/PIs, Trainees/Fellows and Administrators to:

- Prepare
- Route
- Review
- Approve
- Submit

Forms related to NIH trainees or fellows
Roles

❖ PD/PI
  • Prepares/initiates forms; OR
  • Delegates authority to an “assistant” to initiate forms
  • Approves forms

❖ Asst (departmental administrator)
  • Prepares/initiates forms after PI has delegated authority
    ❑ Delegation is based on the award, not on the individual form
  • Routes form to trainee/PI/BO for electronic signature and/or submission
Roles

❖ Trainee
  • Reviews and certifies forms by electronically signing (except payback agreement)
  • Routes forms (except Payback Agreement) to PI for further action

❖ BO (Belinda Tucker, Assistant Dean, Grad Division)
  • Only “Business Official” at UCLA with the authority to approve termination notices
The Forms

❖ SF 2271 – Statement of Appointment
  • Electronically signed by trainee and PI
  • Submitted to NIH by PI

❖ Termination Notice
  • Electronically signed by trainee and PI
  • Routed to Business Official for submission to NIH

❖ Payback Agreement
  • Prepared using xTrain
  • Printed and certified only by trainee (actual signature)
  • Hard copy with original signature transmitted to NIH
Getting Started

Users must have an eRA Commons User Account with one of the following roles:

- PD/PI
- Trainee
- Asst (Assistant)
- Business Official
Requesting User Access

- PD/PIs and Asst should request user access by contacting either their **OCGA Team** or DRA

- Trainees may
  - Wait for a system-generated invitation from the Commons to register; or
  - Contact their **OCGA Team** or DRA
Getting Help

- NIH has provided excellent training resources for specific functions within xTrain:
  - Getting Started (for Trainees)
  - PD/PI Delegation of xTrain Authority
  - Initiating xTrain Appointments
  - xTrain Appointment Errors/Warnings
  - Initiating xTrain Terminations

- As well as an overview of system functionality
  - xTrain for Institutional Users
xTrain and Award Closeout

- Statement of Appointment (2271) forms and Termination Notices are no longer required documents for the Closeout Packet

- Form 10s are still required documentation
QUESTIONS...
The Federal Costing Principles

OMB A-21 and the Cost Accounting Standards
Defines allowable costs and cost principles:

- Federal contract, grant, or cooperative agreement
  - Including federal flow-through (subawards/subcontracts)
- Private sponsors may have different requirements

Distinguishes direct and indirect costs

Determines the appropriate costs to proposal budgets and award expenditures, which must adhere to the same cost principles

Identifies those costs that cannot be charged
Cost Accounting Standards (CAS)

- Incorporated into OMB A-21 1996 Revision
- CAS are requirements to achieve uniformity and consistency in cost accounting practices for recipients of federal funds
- Four basic standards prescribed in OMB Circular A-21 extended to grants, contracts and cooperative agreements
- A Disclosure Statement (DS-2) is required of institutions receiving $25 million or more to disclose their cost accounting practices
Why is CAS Important?

- To create consistency in estimating, accumulating, and reporting costs.
- To ensure that all costs incurred for the same purpose, in like circumstances, are either direct or indirect to help prevent overcharging and double-counting.
- To prevent charging unallowable costs to federal awards by identifying and excluding them from any billing, claim or proposal.
A-21/CAS: Core Requirements

- Allowable
- Allocable
- Applicable
- Necessary
- Reasonable
- Consistent
Is the cost allowable per OMB Circular A-21 then is it in compliance with the sponsor’s terms and conditions?

- General purpose equipment is not allowable and scientific equipment is.

Ref: A-21 section J1-J-54
“Sections 1 through 54 provide principles to be applied in establishing the allowability of certain items involved in determining cost.

These principles should apply regardless of whether a particular item of cost is properly treated as direct or F&A cost.

Be sure to read details. Some expenditures may be allowable in certain instances and unallowable in other instances.
33. Memberships, subscriptions and professional activity costs.

a. Costs of the institution’s membership in business, technical, and professional organizations are allowable.

b. Costs of the institution’s subscriptions to business, professional, and technical periodicals are allowable.

c. Costs of membership in any civic or community organization are unallowable.

d. Costs of membership in any country club or social or dining club or organization are unallowable.
Allocable

- Is the cost benefiting the sponsored project?

- If a cost benefits both the sponsored project and other work at UCLA, it must be allocated in appropriate proportions.

- Is the cost incurred solely to advance the work under the sponsored agreement?
A-21 Definition of Direct and Indirect (F&A) Costs

Direct

- “Costs that can be identified specifically with a particular sponsored project, instructional activity or other institutional activity, or that can be directly assigned to such activities relatively easy with a high degree of accuracy.”
- Ref: A21 Section D1

Indirect (F&A)

- “Costs that are incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored project, instructional, or other institutional activity.”
- Ref: A21 Section E1
“A cost may be considered reasonable if the nature of the goods or services acquired or applied, and the amount involved, reflect the action that a prudent person would have taken under the circumstances prevailing at the time the decision to incur the cost was made.”

The project requires replacement of a power supply for an experiment that requires 300V of power. Is it reasonable to purchase a power supply that has a maximum 3,000V power at over five times the cost?
Is the cost consistent with UCLA’s policies, procedures and practices?

Is the cost incurred for the same purpose, in like circumstances, treated consistently as either direct or F&A across UCLA depts and units?

- If technicians’ salaries are charged directly to grants and contracts, salaries of other staff performing comparable work on non-sponsored projects should also be charged as direct costs for those programs and excluded from the indirect cost pool.
The expenditure must be incurred within the budget period of the award.

- If a budget period is 8/1/2009 – 7/31/2010, expenses incurred before 8/01/2009 and after 7/31/2010 are generally not applicable.
The costs must be recognized as necessary for the performance and completion of the sponsored agreement.
Charging a Cost to a Federal Award


Direct or F&A?
If F&A...

Allowable under Sponsor Policy?
If not...

Allowable under UC and UCLA Policy?
If not....

Allowable under Individual Grant Terms?
If not...

DIRECT

OK TO CHARGE THE COST TO THE GRANT!
Practice these cost principles when creating a proposal budget

1. Determine the allowability of each cost to be proposed
2. Determine how each cost should be proposed
   - direct versus F&A
3. Assign the costs to the proper cost category
4. Always act prudently and in accordance with the cost principles and University policies and procedures
5. When in doubt, contact OCGA or EFM
Increased Awareness

From the Council on Government Relations:

As we reported in the October meeting report (November 19, 2010), “The College and University Indirect Costs Claimed as Direct Costs” HHS OIG audit initiative...is an item we should pay close attention to. Our understanding is that 8 institutions will be selected under this audit initiative, and COGR recently was informed by one institution they have been contacted by the HHS OIG.
Increased Awareness

DEPARTMENT OF HEALTH & HUMAN SERVICES

Dear HRSA Grant Recipients:

The President has challenged the entire Federal Government to improve payments and reduce the risk of waste, fraud, and abuse; and to improve the way HHS fulfills its mission to Americans and provide essential human services. The Program Integrity Initiative is designed to target the greatest risks of fraud, waste and abuse; enhance existing program integrity operations; share new and best program integrity practices; and measure the results of our efforts. The purpose of this message is to inform you of the HRSA efforts toward strengthening program integrity in our own Agency.

(continued)

Letter sent to all grant recipients, January 2011
Increased Awareness

- Increased scrutiny of budgets and justifications
- Particularly in two areas of concern related to direct charging of F&A costs:
  - Administrative Personnel
  - General use supplies and equipment
Section F.6.b.(2) of OMB Circular A-21 addresses direct charging of administrative personnel:

The salaries of administrative and clerical staff should normally be treated as F&A costs. Direct charging of these costs may be appropriate where a major project or activity explicitly budgets for administrative or clerical services and individuals involved can be specifically identified with the project or activity. "Major project" is defined as a project that requires an extensive amount of administrative or clerical support, which is significantly greater than the routine level of such services provided by academic departments. Some examples of major projects are described in Exhibit C.
Examples of “major project” from Exhibit C:

Large, complex programs such as General Clinical Research Centers, Primate Centers, Program Projects, environmental research centers, engineering research centers, and other grants and contracts that entail assembling and managing teams of investigators from a number of institutions.
Examples of “major project” from Exhibit C:

Projects which involve extensive data accumulation, analysis and entry, surveying, tabulation, cataloging, searching literature, and reporting (such as epidemiological studies, clinical trials, and retrospective clinical records studies).
Examples of “major project” from Exhibit C:

Projects that require making travel and meeting arrangements for large numbers of participants, such as conferences and seminars.
Examples of “major project” from Exhibit C:

Projects whose principal focus is the preparation and production of manuals and large reports, books and monographs (excluding routine progress and technical reports).
Examples of “major project” from Exhibit C:

Projects that are geographically inaccessible to normal departmental administrative services, such as research vessels, radio astronomy projects, and other research fields sites that are remote from campus.
Examples of “major project” from Exhibit C:

Individual projects requiring project-specific database management; individualized graphics or manuscript preparation; human or animal protocols; and multiple project-related investigator coordination and communications.
Administrative Salaries

When preparing budget justifications that include administrative salaries

- be very specific and detailed as to how the project meets the criteria for major projects;
- provide sufficient detail and/or explanation to hold up under scrutiny of a sponsor or auditor, or both

The budget and justification should reflect the project description and vice-versa

- the budget and justification alone may not be enough for OCGA to assess the appropriateness of the costs
General Use Supplies and Equipment

Examples include, but are not limited to:

- Computers, peripherals and computer supplies
- Communication costs (telephones, usage costs, long distance charges, fax machines)
  - Exception: TIF
- Copying costs, including supplies to run/maintain copiers
- Office-type supplies – pens, pencils, folders, tape, staplers, binders, desk accessories
- Furniture
In cases where general use costs are requested as direct costs, the budget justification should:

- describe why the costs are necessary to accomplish the programmatic needs of the grant
- provide sufficient detail and/or explanation to hold up under scrutiny

Simply stating that a cost is project specific or identifiable to a project is not sufficient
Unallowable Costs

But I always put these costs in my budgets and nobody ever complained.

Doing something incorrectly in the past, does not mean it is acceptable to continue doing it incorrectly.
Unallowable Costs

The sponsor didn’t question the costs or remove them, so it’s okay.

The burden is with the award recipient (us!) to ensure we follow OMB A-21 as well as any other applicable laws and/or sponsor policies.
Charging a Cost to a Federal Award

If not...

Direct or F&A?
If F&A...

Allowable under Sponsor Policy?
If not...

OK TO CHARGE THE COST TO THE GRANT!

Allowable under UC and UCLA Policy?
If not....

Allowable under Individual Grant Terms?
If not...
Charging a Cost to a Federal Award

If not...

Direct or F&A?
If F&A...

Allowable under Sponsor Policy?
If not...

Allowable under UC and UCLA Policy?
If not....

Allowable under Individual Grant Terms?
If not...

OK TO CHARGE THE COST TO THE GRANT!
CASE STUDIES
PI has approval to put on a working-lunch under a federal grant. The PI is aware that alcohol is not permitted to be paid for by federal funds. However, the bill is in one lump sum with no breakdown of costs. Is this allowable?
You have an award from NIH that studies the effect of alcohol on diving performance and safety in swimming pools. Can you charge the alcohol to the grant?

Allowable
Price Variation

- An MRI facility in the School of Medicine charges a different rate for scans for those within the school than those outside of the school....
PI decides to bring his wife and two children to attend a conference specifically related to his research project and charges all family airplane tickets to the project.
Your PI wants to buy the Journal of Cell Biology and the Journal of Microscopic Cells for Islet Transplant-the exact subject of his NIH grant-and charge them to his NIH grant. Allowable or not?

Allowable only if specific to his project and not available at UCLA
Lab personnel exposed to radioactive substances must wear radiation badges and rings. If turned in late or lost, the department is charged $35/badge and $5/ring. These costs are not included in the approved proposal budget.
Researchers often use items such as graham crackers as incentive for children participating as research subjects. Promotional items such as mugs are sometimes used to attract research subjects. These items are necessary to ensure participation by research subjects.

Allowable
• Unv. Of Chicago (0.65 M – mischarging Fed. Grants)
• Unv. Of Connecticut ($1.3 M training grant issues)
• Med. College of Georgia (10M theft of research funds related to clinical trials, 2 PI’s with jail time)
• Unv. of MN ($32M: program income/clinical trial violations)
• Stanford ($3.1 M – unallowable costs)
• New York Unv. Med. Ctr ($15M – cost sharing/unallowable costs)
• Unv. of Wisconsin (Fraudulent application - PI jail time)
Automatic Notifications

- Update on automatic E-mail notifications:
  - Revised Logic – scheduled to be deployed by 1/14
    - End date will be project, not budget period.
  - Awards in RAS status will be excluded.
  - This new programming will capture most but not all projects. If in doubt, please contact your contract or grant representative.

- Additional Language to include OCGA closeout items
  - “In addition to the financial closeout requirements, Non-financial reports, i.e. final technical and invention reports are likely required. Please review your award synopsis and/or award document and prepare and submit any required reports. If you have questions, you may call or e-mail the OCGA contact noted above”