



**UCLA**

Office of Research Administration

# Research Administrators Forum February 9th, 2017

# Welcome!

**Marcia Smith**  
Associate Vice Chancellor for Research

# Agenda

- **Welcome and Announcements** - *Marcia Smith*
- **ORDM Updates** - *Rory Constancio*
- **OCGA Updates** - *Patti Manheim, Cindy Gilbert*
  - EPASS Changes
  - FDP Reports
  - Unilateral Closeouts
  - Restrictions on State-Funded Travel
- **EFM** - *Yoon Lee*
  - Increased Financial and Audit Risk with Federal Subaccount Transition



**UCLA**

Office of Research Data Management

# Highlights of ORA FY 2017 to Q2 Research Proposals & Awards

<http://portal.research.ucla.edu/>

Rory Constancio  
Director, Office of Research Data Management

# FY 2017 through Q2 Update

## Proposal Requested Dollars & Counts

Requested Dollars	Proposal Counts
\$1,844,910,619	2,865

## Awarded Dollars & Counts

Awarded Dollars	Award (Transaction) Counts
\$489,637,297	2,449

# FY 2017 through Q2

## Comparison to FY 2016 through Q2

### Proposal Requested Dollars & Counts

Fiscal Year	Requested Dollars	Proposal Counts
FY 2017 to Q2	\$1,844,910,619	2,865
FY 2016 to Q2	\$1,857,197,780	2,620

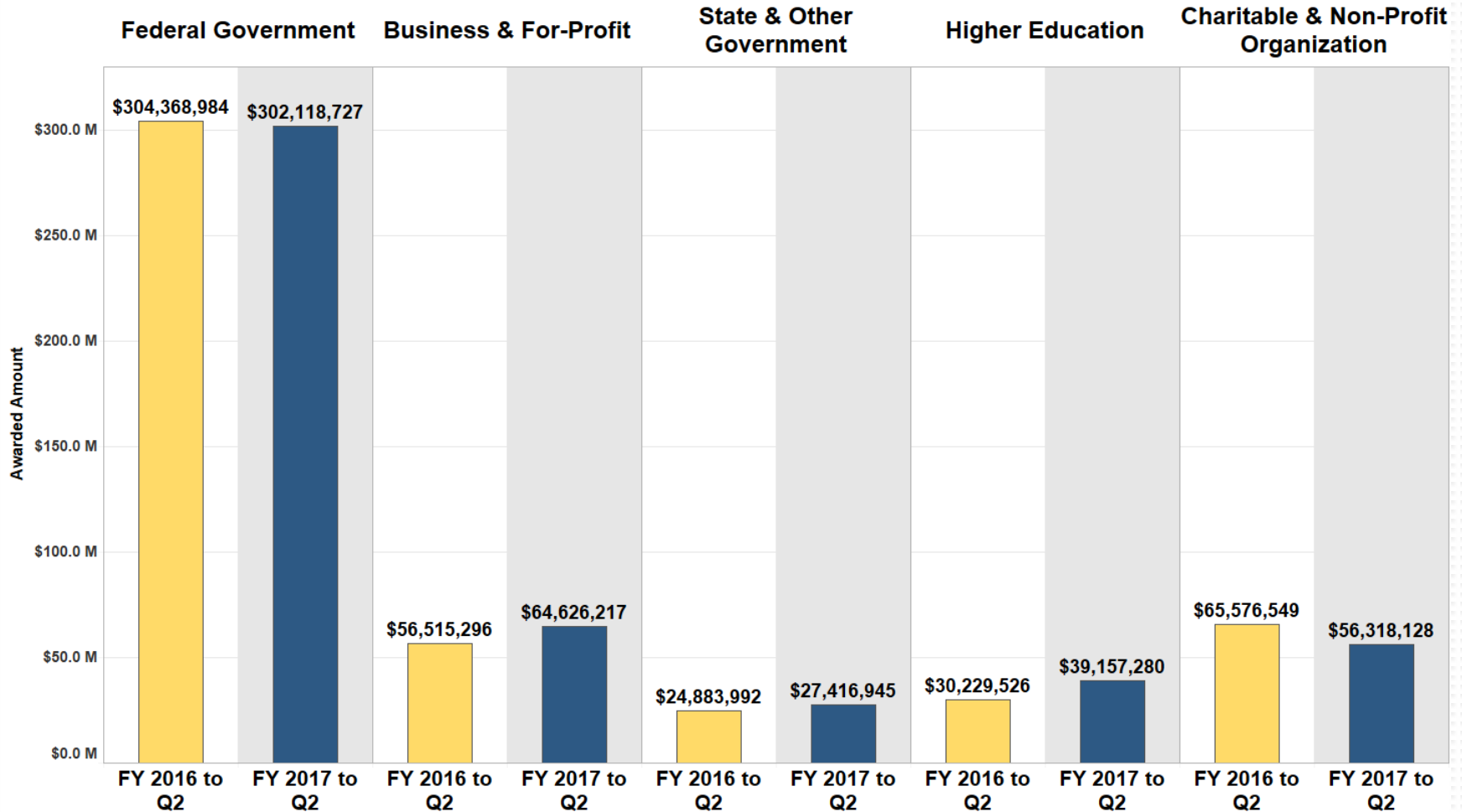
# FY 2017 through Q2

## Comparison to FY 2016 through Q2

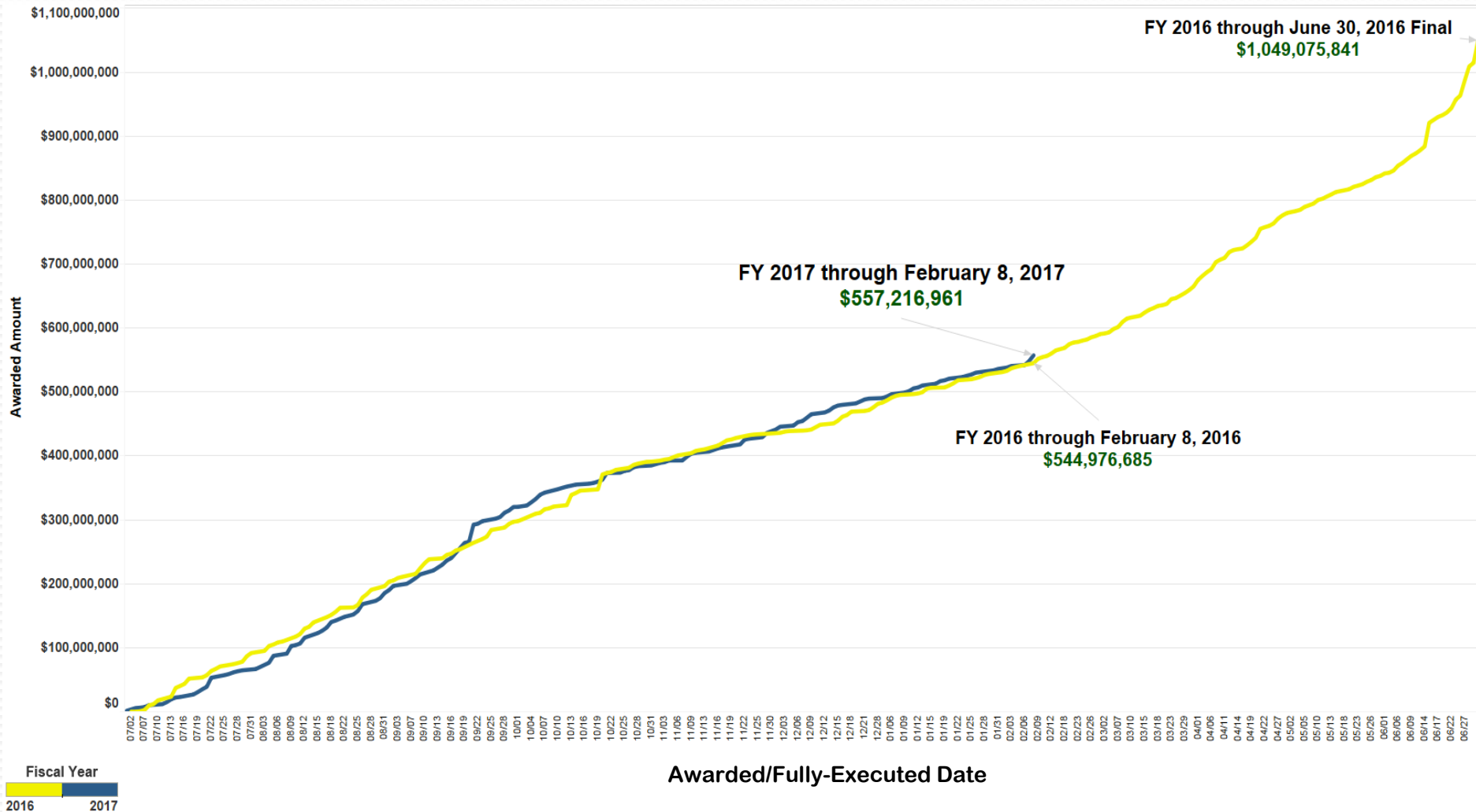
### Awarded Dollars & Counts

Fiscal Year	Awarded Dollars	Award (Transaction) Counts
FY 2017 to Q2	\$489,637,297	2,449
FY 2016 to Q2	\$481,574,347	2,406

# FY 2016 through Q2 & FY 2017 through Q2 Awarded Dollars



# FY 2017 through February 8, 2017 Comparison to FY 2016





**Patti Manheim**  
**Director**

**February 9, 2017**

# EPASS Updates

## 5. Sponsor Information (Entity which will provide funding directly to UCLA)

Sponsor Name: \_\_\_\_\_

Sponsor Due Date: \_\_\_\_\_  Time (Pacific): \_\_\_\_\_

Deadline Type: \_\_\_\_\_ 

Sponsor Guidelines and/or FOA/RFA/RFP:

Yes  No

Attached:  URL (Section 9)  Name/No. # \_\_\_\_\_

Contact (if known): \_\_\_\_\_

Email Address: \_\_\_\_\_

Phone #: \_\_\_\_\_

## Prime Sponsor Information (Complete this section when UCLA is a subrecipient)

Prime Sponsor Name: \_\_\_\_\_

Prime Sponsor Due Date: \_\_\_\_\_  Time (Pacific): \_\_\_\_\_

Prime Sponsor Guidelines and/or FOA/RFA/RFP:

Yes  No

Attached:  URL (Section 9)  Name/No. # \_\_\_\_\_

Contact (if known): \_\_\_\_\_

Email Address: \_\_\_\_\_

Phone #: \_\_\_\_\_

Allows for more complete information leading to efficient, thorough review.

# EPASS Updates

## 6. Proposal Checklist - *Carefully Review and Answer All Questions*

Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	PI Exception Required? ( <a href="#">Check Requirements</a> and <a href="#">Look up Eligibility</a> ). If yes, attach approval form ( <a href="#">Sample Approval Form</a> )
<input type="checkbox"/>	<input type="checkbox"/>	On Campus Space? Indicate location: Building: _____ Room: _____
<input type="checkbox"/>	<input type="checkbox"/>	Off Campus Space? Indicate location: _____
<input type="checkbox"/>	<input type="checkbox"/>	Outgoing Agreements? If yes, provide entity names in Section 9, Remarks, and attach <a href="#">Sub-recipient Commitment Form(s)</a> or <a href="#">FDPExpanded Clearinghouse Subrecipient Letters(s) of Intent</a> for each entity. PI signature below indicates review and approval of cost reasonableness. (See <a href="#">Subaward Initiation and Management</a> )
<input type="checkbox"/>	<input type="checkbox"/>	Does this project involve activities outside the U.S. or partnership with International Collaborators?
<input type="checkbox"/>	<input type="checkbox"/>	Is any Cost Sharing/Matching proposed in this application? ( <i>Cash, unfunded effort, or in-kind contributions - do not include salary cap differential.</i> ) Yes, required by sponsor? <input type="checkbox"/> Yes (mandatory committed) <input type="checkbox"/> No (voluntary committed) Cost Share Amount: _____ Source/FAU#: _____
<input type="checkbox"/>	<input type="checkbox"/>	Is any unfunded effort proposed in this application? <i>In accordance with UC policy, "unfunded effort", must be reported in ERS.</i> (Do <u>not</u> include salary cap differential here) Source/FAU#: _____
<input type="checkbox"/>	<input type="checkbox"/>	Do you anticipate program income? If yes, specify: _____

# EPASS Updates

## *Carefully Review and Answer All Questions*

- Receive incomplete/incorrect Checklists.
- Information is important for compliance:
  - University – PI Exception, Cost Sharing (identification of funding source), space, university IP,
  - State - COI,
  - Federal – Export Control, COI, Subrecipients, animal and human subjects
- Data capture is retrievable/reportable

# EPASS Updates

*Is any Cost Sharing/Matching proposed in the application?*

Project costs not borne by the sponsors but supported by contributions from the University and/or third parties.

# EPASS Updates

**Mandatory Cost Sharing** – that portion of the University contribution to a sponsored project which is **required by the terms** of the project's Request for Proposal or Application (RFP/RFA).

- requires tracking via the financial system
- auditable documentation
- reporting to the sponsor and is part of the award eligibility criteria

[UC Contract and Grant Manual; 5-310](#)

# EPASS Updates

**Voluntary Committed – Not required by sponsor.** University-initiated contributions to a sponsored project.

Voluntary cost sharing is discouraged under the University's policy requiring full cost recovery for work conducted under extramural awards as it commits University resources and creates additional award administration documentation requirements.

- requires tracking via the financial system
- auditable documentation
- reporting to the sponsor

[UC Contract and Grant Manual; 5-320](#)

# EPASS Updates

## Voluntary Uncommitted Cost Sharing

Voluntary uncommitted cost sharing refers to any effort of University faculty (and possibly senior researchers) beyond that which is committed and budgeted for in a sponsored agreement. Such voluntary uncommitted cost sharing is not included in either the proposal budget or the narrative.

[UC Contract and Grant Manual; 5-340](#)

# EPASS Updates

## Cash

- Actual cash transactions
- Value of a cash transaction
- University purchased equipment

## Unfunded Effort

- Effort committed to execution/performance of the project
- University covers the costs
- Costs not borne by the sponsor

# EPASS Updates

## Unfunded Effort

*Is any unfunded effort proposed in this application? In accordance with UC Policy “unfunded effort”, must be reported in ERS.*

### 5-330 Committed Cost Sharing/Matching

“Committed cost sharing includes mandatory and voluntary cost sharing identified in the project proposal (in the proposed budget or in the project narrative). It represents a commitment by the University that must be fulfilled if the proposal is accepted as offered by the University and awarded by the sponsor. By accepting an award with committed cost sharing, the University also incurs an obligation to document the financial contribution provided to the sponsored project. **Reporting may also be required by the sponsor. (See 5-500, Cost Sharing records and Reports.) In addition, all information on commitments must be identified for proper effort reporting** and for F&A rate proposal development.

Should the awarded amount be reduced from the proposed amount, the committed cost sharing may need to be adjusted accordingly, particularly if the awarded budget reduction requires a change in the Scope of Work. Any reduced cost sharing should be correctly stated in the award.”

# EPASS Updates

**In-Kind Contributions** - the value of non-cash contributions provided by the University or non-federal third parties to a sponsored project when such contributions directly benefit that project.

- services provided by volunteers and
- property donated by non-federal third parties.

[UC Contract and Grant Manual; 5-420](#)

# EPASS Updates

For proposal submissions funded by [Federal Public Health Service \(PHS\)](#) or an agency that has adopted the PHS regulations, **provide, below, the name and email address** for all project personnel responsible for the design, conduct, or reporting of research. **All named individuals must have a current disclosure in eDGE, which is accessed at [coi.research.ucla.edu](http://coi.research.ucla.edu).**

No other project personnel responsible for the design, conduct, or reporting of research.

[Click here to copy Investigators information from section 1](#)

First Name	M.I.	Last Name	Email Address	For ORA Use Only

Clarifying language and removal of outdated information.

# eDGE Disclosure Tracking Form Updates

## eDGE **Annual Financial** Disclosure Tracking for PHS **Non-Competing Continuation**, Progress Reports and No-Cost Extensions

eDGE (Electronic Disclosure Gateway) disclosure required for **non-competing continuation (incremental funding)**, progress report (RPPR or hard copy) submissions and no cost extensions funded by **Federal Public Health Service (PHS) or an agency that has adopted the PHS regulations**.

In lieu of filing the 740(s), complete the information below for all **current and new** project personnel responsible for the design, conduct, or reporting of research. To access the web-based disclosure system, go to [coi.research.ucla.edu](http://coi.research.ucla.edu).

### Clarifying Language:

- *Annual* requirement
- *Non-competing continuations* (generally applies to flow-through funding)
- Emphasis on both *current and new* investigators

# eDGE Disclosure Tracking Form Updates

Progress Report Deadline Date	_____	NCE Request Date	_____
PI Name	_____	Sponsor Award #	_____
Fund #	_____	Date	_____

Please check applicable boxes below:

Non-Competing Continuation – Budget Period: \_\_\_\_\_

Progress Report – Deadline Date: \_\_\_\_\_

NCE Request Date: \_\_\_\_\_

PI Name: \_\_\_\_\_ Sponsor Award #: \_\_\_\_\_ Fund #: \_\_\_\_\_

No other project personnel are responsible for the design, conduct, or reporting of research.

Yes project personnel below are responsible for the design, conduct, or reporting of research.

- Added Non-competing Continuation
- More user friendly format
- Move “date” to the signature line
- Added affirmative response

# eDGE Disclosure Tracking Form Updates

**Principal Investigator Signature(s)**  
(Only required for PHS **Non-competing Continuations** or Progress reports submitted by OCGA. Not required if PI submitted RPPR to NIH in Commons.)  
*The Investigator(s) certifies to the following: (1) that the information submitted within this application is true, complete and accurate to the best of their knowledge; (2) that any false, fictitious, or fraudulent statements or claims may subject the Investigator(s) to criminal, civil or administrative penalties; (3) agrees to accept responsibility for the scientific conduct of the project and to provide the required progress reports if a grant is awarded as a result of the application; and (4) that you are not currently debarred, suspended or ineligible to receive federal or non-federal funds. When multiple Investigators are proposed in an application this assurance must be obtained by all named Investigators.*

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Signature(s) Date

- Added Non-competing Continuation
- Added “date” to the signature line

# Staff Update

Saima Sharoff – Grant Analyst – Grants and Cooperative Agreements

Senior Fund Manager in the Department of Medicine, Division of Infectious Diseases, with both pre-award and post-award responsibilities. Four years plus years' experience in this position with extensive knowledge of NIH and non-profit sponsors.



**Cindy A. Gilbert**  
**Assistant Director**

**February 9, 2017**

# Agenda

- FDP Report – Federal Updates
- NIH Unilateral Closeout
- AB 1887 – Travel Restrictions

# The Federal Demonstration Partnership (FDP)

- Cooperative initiative among 10 federal agencies and 155 institutional recipients of federal funds.
- Purpose: to reduce administrative burdens associated with research grants and contracts.
- Forum for representatives from universities and non-profits to work collaboratively with federal agency officials to improve the research enterprise.
- Meetings three times/year.
- Ongoing working group activities throughout the year.
- [www.thefdp.org](http://www.thefdp.org)

# Federal Updates – Research Terms and Conditions

Initiative led by NSF and NIH

- Develop revised set of RTCs to implement Uniform Guidance.
- Will apply to research and research related grants from participating agencies to IHEs and non-profits.
- Co-chairs are in final negotiations with OMB on resolving remaining issues.
- Final version of RTCs will be posted in the Federal Register.
  - Notice will encourage other federal agencies to adopt.

# Federal Updates – National Science Foundation

## New PAPPG Implementation

- Significant Changes
  - Enhanced coverage of cost sharing to clarify difference between voluntary committed and voluntary uncommitted.
  - Indirect cost rates lower than negotiated rates considered voluntary committed cost sharing – *not allowed under policy*.
  - Greater clarity on instructions for proposals submitted later due to natural or man-made disasters.

# Federal Updates – National Science Foundation

## New PAPPG implementation

- Applies to proposals submitted, or due, on or after January 30, 2017.

# Federal Updates – National Science Foundation

## New PAPPG Implementation

- Significant Changes
  - Separate section on *Types of Proposals* which highlights special proposal types such as RAPID, EAGER, GOALI, and RAISE.

# Federal Updates – National Science Foundation

## Electronic Research Administration Forum

- Gather Opinions, perspective and feedback around NSF ERA activities
- Proposal System Modernization (PSM) webinars
  - April 2016 and September 2016
  - Next webinar TBA
- More researcher participation is strongly encouraged.
- Website: [https://www.nsf.gov/bfa/dias/policy/era\\_forum.jsp](https://www.nsf.gov/bfa/dias/policy/era_forum.jsp)
- List-serv: send email to [NSF-ERA-FORUM-subscribe-request@listserv.nsf.gov](mailto:NSF-ERA-FORUM-subscribe-request@listserv.nsf.gov)

# Federal Updates – National Science Foundation

## Outreach

- NSF Grants Conference (archived webcast from November 2016)
  - <https://goo.gl/vwJSX1>
- NSF Grants Conference
  - June 5 – 6, 2017
  - Louisville, KY
  - <https://goo.gl/X8ney5>

# Federal Updates – National Institutes of Health

## Continuing Resolution

- PL 114-254 funds federal government until April 28, 2017
- Funding is at 99.8 of FY 2016 level.
- Stay tuned!

# Federal Updates – National Institutes of Health

## FY 2017 Grants Policy Statement

- Applicable to all grants and cooperative agreements with **budget periods** beginning on or after October 1, 2017.
- Review significant changes.
- Will continue to publish interim changes through guide notices.
- <https://grants.nih.gov/policy/nihgps/index.htm>

# Federal Updates – National Institutes of Health

## Interim RPPR

- Effective February 2017, I-RPPR will be required while Type 2 applications are under consideration.
- If Type 2 is funded, NIH will treat the I-RPPR as the annual for final year of previous segment.
- If Type 2 is not funded, I-RPPR will be treated as the Final.
- Watch for updates and FAQs on the RPPR website:  
<https://grants.nih.gov/grants/rppr/index.htm>

## Extension of Effective Date for Single IRB

- New date: September 25, 2017.
- Stay tuned for updates!

# Federal Updates – National Institutes of Health

## 2017 NIH Regional Seminars:

### Spring Regional Seminar

New Orleans, LA

May 3 – 5, 2017

### Fall Regional Seminar

Baltimore, MD

October 25 – 27, 2017

See: [NOT- OD-17-026](#)

# Federal Updates – Air Force Office of Scientific Research

## Current BAAs

BAA-AFRL-AFOSR-2015-0007

*Research Interests of the Air Force Office of Scientific Research*

Issued July 1, 2016

BAA-AFRL-AFOSR-0008

*Air Force Defense Research Sciences Conference and Workshop Support*

Issued July 21, 2016

Both open until superseded

# Federal Updates – Air Force Office of Scientific Research

## Use of Grants.gov

- All proposals submitted to AFOSR announcements must be submitted through Grants.gov.
- USPS will only be accepted if Grants.gov is down and proposal is accompanied by a Grants.gov help ticket explaining the reason for rejection.
- AFOSR will not accept due to user error or incorrect forms are used.

# Federal Updates – Final Thoughts

## Final Thoughts

- All federal reps throughout all sessions referenced the need for timely reporting:
  - Financial
  - Technical/Progress
  - Equipment
  - Invention
- Data is important.
- Still need to achieve more common reporting elements and uniformity across all sponsors.

# NIH Unilateral Closeout of Awards

- Email notifications of unilateral closeout to PI and OCGA.
- Can affect future funding for individual PIs and the University.
- Applies to *all* final reports (submitted via eRA Commons)
  - Financial – initiated and submitted by EFM
  - Technical (RPPR) - initiated by PI and submitted by PI or OCGA
  - Invention – initiated by PI and submitted by OCGA
- Deliverables available on Snapshot, PI Portal, Commons.

# AB 1887 - State Funded Travel Prohibition

- Assembly Bill 1887 approved September 27, 2016
- Prohibits state funded travel to certain states\* that have passed laws that:
  - authorize discrimination based on sexual orientation, gender identity and gender expression, or
  - voids or repeals existing state or local protections against such discrimination.

*\*Currently Kansas, Mississippi, North Carolina, Tennessee*

## AB 1887 - State Funded Travel Prohibition

- ***Does not*** affect travel that is paid for or reimbursed using non-state funds.
- ***Does*** prohibit the University from requiring any employee to travel to restricted states ***regardless of funding source***.
- University has a responsibility to monitor [Attorney General's list](#) for changes.
- See:
  - ORA News – February 6, 2017
  - Memo from Scott Monatlik – January 13, 2017
  - FAQs

Contact your OCGA Team for questions about specific funds.

# Questions?

# RESEARCH ADMINISTRATION

**Extramural Fund Management**

**February 9, 2017**

# **Increased Audit and Financial Risk with Federal transition to Subaccount**

Yoon Lee

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# NIH award transition to subaccount

## Timeline overview

### **July 2013:**

- Under directive of DHHS, NIH announced transition of all domestic awards in the pooled account to subaccounts in Payment Management System (PMS).
- Goals were to increase data transparency related to all financial activities on the letter of credit and to enhance effective and timely closeout of awards.

### **October 2013:**

- NIH started issuing a competing awards under subaccounts in PMS.

### **October 2015:**

- NIH started transitioning non-competing awards from the pooled account to subaccounts in PMS.

# NIH award transition to subaccount

## Pooled account:

- UCLA draws cash for all awards in the pooled account in lump sum every week and reports detailed cash draw amount for each award quarterly (FFR 425).
- NIH does not have cash disbursement information at award level until the quarterly FFR is submitted.

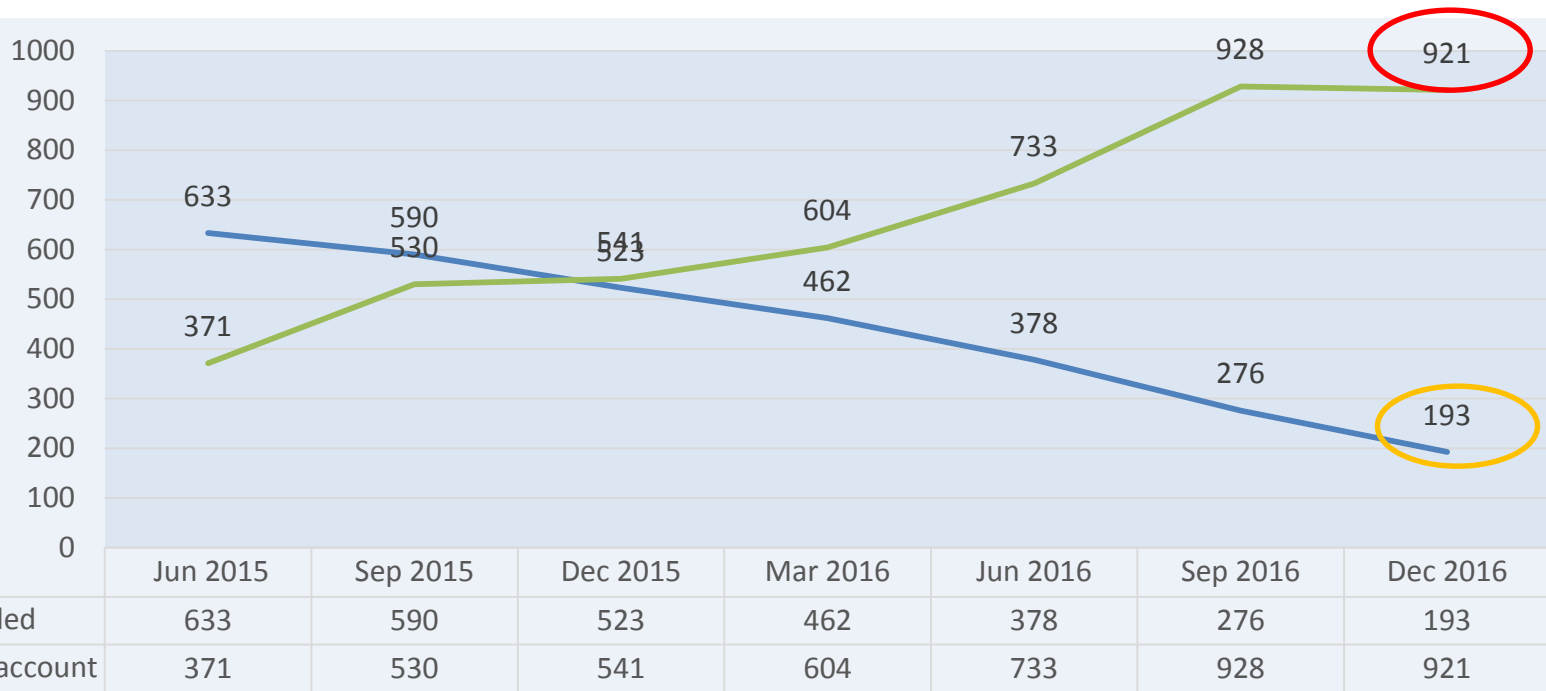
## Subaccount:

- UCLA is required to identify the amount to draw at award level each time when cash is drawn.
- NIH has access to cash disbursement information at award level at any given point of time.
- UCLA generally draws cash every week → UCLA spending information is provided for each award in PMS every week.

# NIH award transition to subaccount

## Transition Trend and Status at UCLA

- As of December 31, 2016, UCLA had 921 awards in subaccounts and 193 awards remaining in the pooled account. 83% of awards are in the subaccount.



# NIH Cash Draw Data

## NIH Cash Draw Amount for October 2016 through January 2017

- Average monthly draw amount is approximately \$31.5 million. 95% of amount are now drawn from subaccounts.

Total Cash Draw	Oct-16	Nov-16	Dec-16	Jan-17
Pooled account	1,714,189.18	784,302.78	305,334.92	1,469,399.08
Subaccount	29,143,375.53	45,455,459.80	9,849,391.16	29,986,689.10
<b>Total</b>	<b>30,857,564.71</b>	<b>46,239,762.58</b>	<b>10,154,726.08</b>	<b>31,456,088.18</b>
Subaccount / Total	94%	98%	97%	95%

- Average monthly refund is over \$700k, about 2.5% of average monthly expenditure. More frequent refunds are noted on certain funds.

Subaccount	Oct-16	Nov-16	Dec-16	Jan-17
Cash draw (expenditures)	29,702,767.89	46,031,853.23	10,501,067.03	31,073,454.77
Refund	(559,392.36)	(576,393.43)	(651,675.87)	(1,086,765.67)
<b>Total</b>	<b>29,143,375.53</b>	<b>45,455,459.80</b>	<b>9,849,391.16</b>	<b>29,986,689.10</b>
Refund/Expenditures	2%	1%	6%	3%

# NIH Cash Draw Data

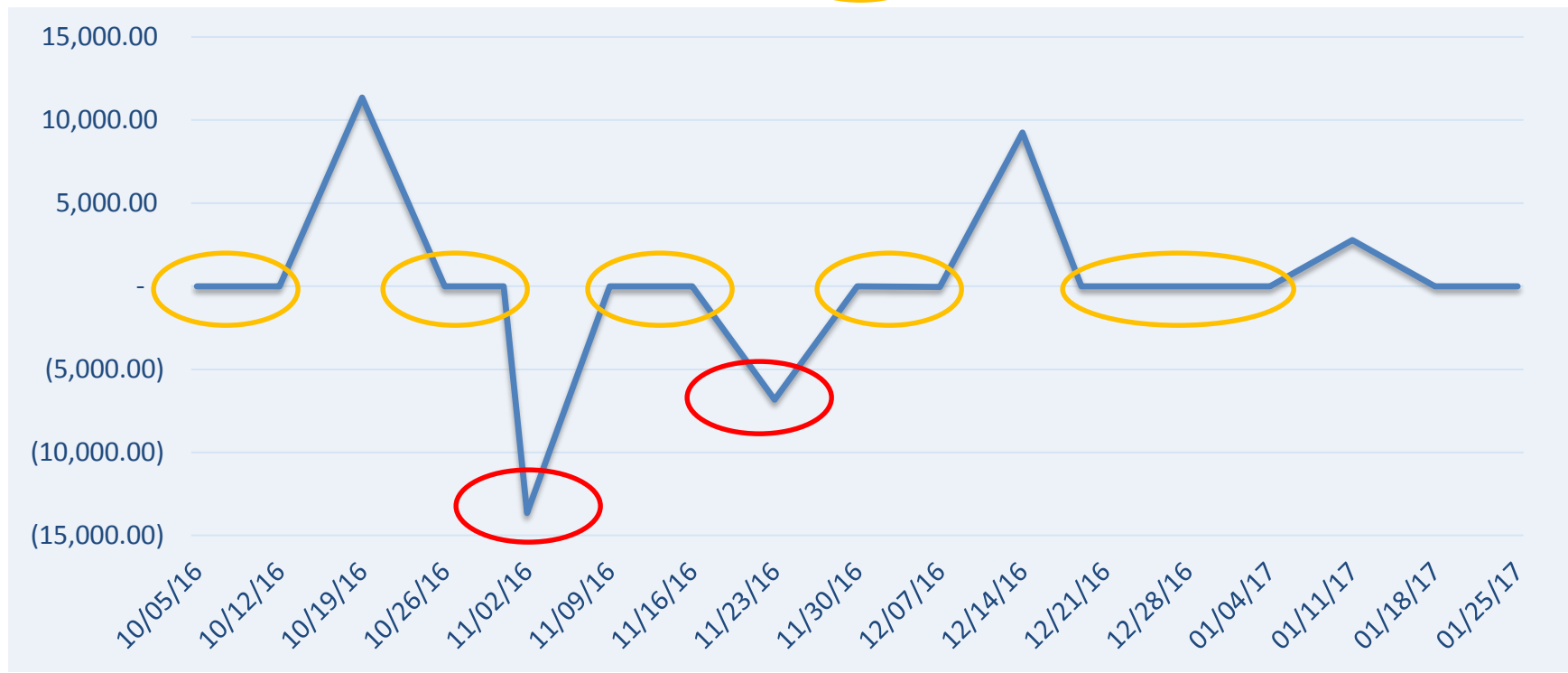
## Return of funds on awards:

- Occurs when expenses decreased from the last draw
- Represents cost transfers → Costs were incorrectly charged to the project
- Frequent and/or material refund may alert NIH of deficiency in internal controls over administering grants
- For awards in the pooled account, frequency and amount of refunds are not transparent since award level data are provided quarterly.
- For awards in subaccount, frequency and amount of refunds are tracked in a transparent manner.

# NIH Cash Draw Data

- Weekly draw activity on one actual NIH award in the subaccount from Oct 2016 – Jan 2017

○ Credit back to LOC: returning cash    
 ○ No cash request: no expense incurred



# NIH Cash Draw Data

**Spending data for awards in subaccount are up to date and readily available for NIH. Questions can be asked when**

- Frequent and/or material refunds are made
- Accelerated spending toward the end of the project period is noted
- High unexpended balance remains when the project period is near to end
- Spending is deemed not aligned with progress reported

**These are not necessarily mean improper financial management; however if appropriate explanation and/or documentation is not provided when asked, they may lead more investigation**

# NIH FFR Approval and De-obligation

- We noted significant improvement in NIH's turnaround times to review FFR: generally within 1 month after FFR submission.
- With transition to subaccounts, we also noted immediate de-obligation of funds in PMS: on the same day of FFR approval.
- Additional expenses not reported in the original FFR is not likely to be reimbursed even if the revised FFR is submitted once funding is de-obligated in PMS.
- Timely submission of accurate COP to EFM will ensure reimbursement of costs incurred for the project.

# NIH FFR Approval and De-obligation

## Case #1: NIH-National Institute of Environmental Health Sciences (NIEHS)

Project Period	09/22/14 - 08/31/16	FFR Due	11/29/2016
Federal funds authorized	162,002.07	FFR Submitted	11/28/2016
Final expenses reported	154,000.00	Date NIH accepted FFR	12/19/2016
Unobligated balance	8,002.07		

PMS	POST DATE	ISSUE DATE
-8,002.07	12/21/2016	12/19/2016
0	8/14/2015	8/13/2015
154,000.00	9/22/2014	9/19/2014
8,002.07	3/9/2016	3/8/2016
154,000.00		

**FFR accepted on 12/19/16 → Balance de-obligated on 12/19/16**  
 (Balance de-obligated within 1 month from submission of FFR)

# NIH FFR Approval and De-obligation

## Case #2: NIH-National Institute of Neurological Disorders and Stroke (NINDS)

Project Period	07/01/14 - 06/30/16	FFR Due	10/28/2016
Federal funds authorized	423,500.00	FFR Submitted	10/27/2016
Final expenses reported	422,047.15	Date NIH accepted FFR	11/8/2016
Unobligated balance	1,452.85		

PMS	POST DATE	ISSUE DATE
-1,452.85	11/10/2016	11/8/2016
192,500.00	4/30/2015	4/29/2015
231,000.00	4/23/2014	4/23/2014
422,047.15		

**FFR accepted on 11/08/16 → Balance de-obligated on 11/08/16**  
 (Balance de-obligated within 1 month from submission of FFR)

# NIH FFR Approval and De-obligation

## Case #3: NIH-National Institute of Child Health and Human Development (NICHD)

Project Period	05/12/14 - 04/30/16	FFR Due	7/29/2016
Federal funds authorized	152,075.00	FFR Submitted	7/26/2016
Final expenses reported	149,688.09	Date NIH accepted FFR	8/16/2016
Unobligated balance	2,386.91		

PMS	POST DATE	ISSUE DATE
-2,386.91	8/18/2016	8/16/2016
75,075.00	3/18/2015	3/17/2015
77,000.00	5/13/2014	5/12/2014
149,688.09		

**FFR accepted on 8/16/16 → Balance de-obligated on 8/16/16**  
 (Balance de-obligated within 1 month from submission of FFR)

# Increased Risk for Audit and Financial Loss

## Spending data are readily available for funds on letter of credit

- Transition of all NIH awards in the pooled account to subaccount in PMS is anticipated to be completed in August 2017.
- Cash draws on all NSF awards are performed at the award level in ACM\$.
- More data are available for sponsors to conduct various data analytics to effectively and efficiently identify questioned and/or unusual patterns for further investigation.

## It is important

- To record expenses to the correct project to minimize cost transfers.
- To monitor spending rate in relation to project progress and record charges timely.
- To submit an accurate FFR timely for reimbursement for cost incurred for the project.
- To be aware that a window of opportunity for revision is short.

## Contact information

EFM Website

<http://ora.research.ucla.edu/EFM/>

Yoon Lee

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[yoan.lee@research.ucla.edu](mailto:yoan.lee@research.ucla.edu)

