



# Research Administration Forum

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September 10, 2020

# Welcome and Announcements

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- This is NOT being recorded
- We will answer questions at the end of each segment as time permits
- Submit questions via Zoom Q&A window
- Slides will be posted on ORA website following the meeting

# Agenda

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- **Welcome & Announcements** – *Marcia Smith*
- **Research Safety and Animal Welfare Administration** – *Jennifer Klahn*
  - RATS 2.0, AALAC Site Visit
- **Human Research Protection Program** – *Moore Rhys*
  - Updated Guidance on Investigator Responsibilities
- **Extramural Fund Management** – *Yoon Lee, Jennifer Iglesias*
  - Effort Report Release
  - PAMS Enhancements
- **Research Policy and Compliance** – *Aaron Taber*
  - Reminder about Iran Sanctions

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# Research Safety & Animal Welfare Administration (RSAWA) Updates

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September 2020 RAF

Jennifer Klahn, MA, CPIA

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Research Safety & Animal Welfare Administration

- **System Updates**
  - RATS 2.0
- **AAALAC Site Visit**
- **RSAWA Contacts**

Research Safety & Animal Welfare Administration

- **System Updates: RATS 2.0**
  - Protocols Submitted/Approved
    - New: 17/3, TR: 42/12, AR: 8/6, AM: 51/21
  - Turn-around times (calendar days)
    - New: ~32d, TR: ~37d, AR: ~14d, AM: ~23d
  - Standard Procedures (n=232)
    - Sub Admin: 104, Euth: 47, Behav Test: 44, Surv Surg: 10, ID: 8
    - Mouse: 86, Rat: 81
  - Standard Substances (n=900)



Research Safety & Animal Welfare Administration

- **System Updates: RATS 2.0**
  - Urgent amendments in L-RATS
  - ARC admin team available via office hours, 1:1 Zoom meetings to help populate smartform
  - Basic and advanced training available
  - Regular “quick tips” for 2.0
  - <https://form.research.ucla.edu/ora/ora-news-subscription>



# RSAWA Updates

Research Safety & Animal Welfare Administration

## RATS 2.0 Quick Tip:

When you log on to RATS 2.0, you will notice that we have created a research team for you (when you click on “My Inbox,” you will find your research team on the left hand side of the page). When we migrated protocols into RATS 2.0, we added all personnel listed on your Legacy RATS protocol(s) as research team members. As such, it is important that you review and update your research team members list to only include personnel that you would like to have access to your research team substances and procedures (research team members also have the ability to create team substances and procedures). Research team members DO NOT have the ability to create and submit protocols on your behalf, however you can assign a PI Proxy (or multiple PI Proxies) to your protocols to allow them to submit and create protocol applications on your behalf. You can find the “Assign PI Proxy” activity in the protocol workspace.



# RSAWA Updates

Research Safety & Animal Welfare Administration

## Pre-Submission

### Next Steps

Edit Protocol

Printer Version

View Differences

### Submit

- Submit PI Assurance
- Assign Primary Contact
- Assign PI Proxy
- Manage Guest List
- Manage Related Safety Protocols
- Add Comment
- Discard
- Copy Submission

ARC-2020-1081

## Migrated Protocol

Principal investigator:	Joe Bruin	Letter:	
Faculty Sponsor:		Protocol type:	Experimental Research
Submission type:	New Protocol Application	Initial Approval Date:	
Primary contact:		Admin office:	ARC
IACUC coordinator:			
Consulted vet:			
PI proxies:		Codicils:	No
RATS Legacy #:			
Species:	Mouse		



History Experiments Documents Codicils Reviews Contacts Snapshots Training ...

Filter by ? Activity ▼  🔍 + Add Filter ✕ Clear All

Research Safety & Animal Welfare Administration

- **AAALAC Site Visit**

- October 5-9, 2020
- Site visit team all local to Southern California
- Hybrid in-person / remote visit
- Announcement sent to ARC PI listserv
- Researchers with active labs should prepare for visit
- Contact ARC or DLAM with questions or to schedule walk-through and/or lab visit (virtual or in-person)



# RSAWA Staff

Research Safety & Animal Welfare Administration

- ARC Staff: [arc@research.ucla.edu](mailto:arc@research.ucla.edu) or 310-206-6308
  - RATS 2.0 support: [RATSHelp@research.ucla.edu](mailto:RATSHelp@research.ucla.edu)
- IBC Staff: [ibc@research.ucla.edu](mailto:ibc@research.ucla.edu) or 310-794-0262
- RSC Staff: [psc@research.ucla.edu](mailto:psc@research.ucla.edu) or 310-206-5601
- RSAWA Director: [jennifer.klahn@research.ucla.edu](mailto:jennifer.klahn@research.ucla.edu)  
or 310-794-9645





# OHRPP Updates

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September 10, 2020

# OHRPP Updates

**Investigator  
Responsibilities**



**Learn at Lunch**



**OHRPP Office  
Hours**



**Human Research  
News**



# Investigator Responsibilities - overview

Qualifications to serve as a PI are set by UCLA Policy

- [UCLA Policy 900](#)

PI Duties and Responsibilities are set by UCLA Policy

- [UCLA Policy 991](#)

OHRPP guidance and procedure

- [PI Responsibilities](#)



# Investigator Responsibilities - highlights

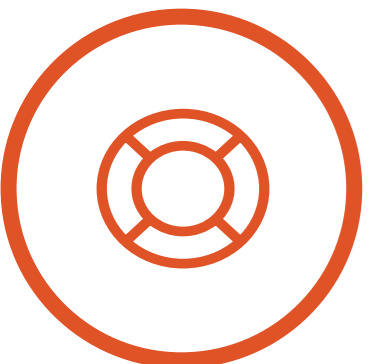
- As PI, have **sufficient training/qualifications** to safely oversee this specific type of research project:
  - **Clinical medical expertise to oversee biomedical clinical trial**
  - **Cultural expertise to oversee research in specific communities (such as in foreign countries, with indigenous communities, etc...)**

# Investigator Responsibilities - highlights

- Ensure that all *staff on the research* team are:
  - ☑ Qualified to do the tasks they are assigned
  - ☑ Have completed all required training (as directed by IRB, other UCLA entities, and as required by the funding agency/Sponsor, if applicable)
  - ☑ Are appropriately supervised
    - To successfully conduct the tasks they are qualified to do
    - To **not** conduct tasks for which they are not qualified

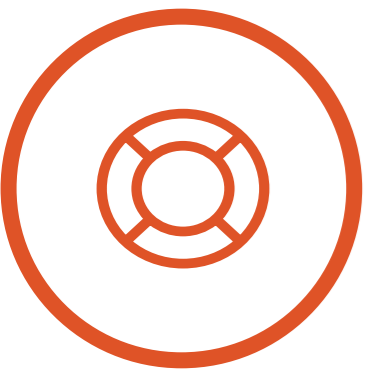
# Investigator Responsibilities - highlights

- **Design the study to**
  - maximize benefits and minimize risks
  - ensure equitable subject selection
  - Obtain legally effective consent or waiver from the IRB
  - Obtain HIPAA authorization or waiver from the IRB (acting as the privacy board for research), if applicable



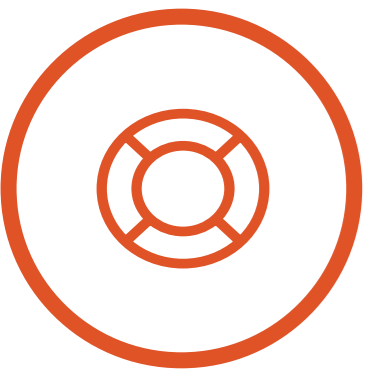
## Investigator Responsibilities - highlights

- **Begin research only after *IRB and all other institutional/regulatory requirements* are met. Other approvals/reviews might include:**
  - Research Advisory Panel of the CA Attorney General's Office (for schedule 1 or 2 drug research)
  - CIRC
  - ISPRC
  - MRSC
  - Etc...



## Investigator Responsibilities - highlights

- **Conduct the research as described in the IRB-approved application**
- **Submit Amendment applications and receive approval before implementing changes to the protocol**
  - *Except for deviations from the approved protocol to prevent immediate hazards to participants*
- **Submit PAR applications as required per the PAR Guidance**
- **Submit continuing review applications or complete annual PI assurances to continue the research**



# Investigator Responsibilities - highlights

- When in doubt about IRB requirements, *ask OHRPP directly*

## Learn at Lunch - September

***“Investigator Responsibilities for single site (UCLA) and central/lead site (UCLA + other sites) under a reliance agreement: best practices and how to avoid pitfalls”***

**Presenter: Moore Rhys, OHRPP**

**Date/time: September 24, noon-1pm**

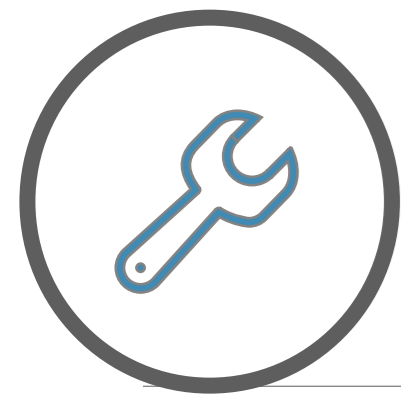
**[Register in advance](#)**



## OHRPP's "Office Hours"

- OHRPP Quality Improvement Unit staff are hosting *half-hour open Q/A sessions every other week* to answer your questions
- *Upcoming sessions*
  - Tuesday, September 15, 2020 8:30am
  - Tuesday, September 29, 2020 8:30am

Register once and you can join any session.



## Reminder - Subscribe to Human Research News

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**To be in the know when OHRPP releases updated guidance and offers training opportunities, please subscribe to Human Research News**

➤ ***To subscribe, visit [ORA news subscription](#)***

# Any Questions?

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## Contact Information

### OHRPP Website

<https://ohrpp.research.ucla.edu>

### Moore Rhys, OHRPP Asst. Director

Phone: x46339

Email: [moore.rhys@research.ucla.edu](mailto:moore.rhys@research.ucla.edu)



# Extramural Fund Management

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September 10, 2020

# Agenda

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- **Effort Report Release**
- **PAMS Enhancements**

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# Effort Report Release

Yoon Lee

# Release Overview

- **Effort reports will be released for the following periods.**

Reporting Period	Non-Academic and 11/12 Academics	9/12 Academics
Summer	N/A	June 2018 – September 2018 (*)
Modified Fall	August – December 2018	August – October 2018
Winter	January – March 2019	November 2018 – February 2019

*(\*) Additional Compensation DOS codes only*

- **Target date to release:** Mid-late September
- **Certification due date:** 45 days after the release of effort reports.
- All payroll transactions through July 2020 are loaded in ERS so all direct retros processed for the periods that will be released above will be reflected in the effort reports.
- Certain effort reports will be inaccurate as not all UCPATH issues have been resolved. EFM will publish the report listing effort reports impacted by known UCPATH issues and special instruction for each type of issues.

# Two Different Types of Issues affecting Effort Reports

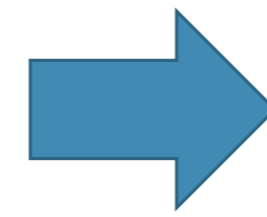
Recapture from June 2020 RAF

## Issue Type

### Incorrect payroll amount (\$)

The actual dollar amount on the funding source is not accurate.

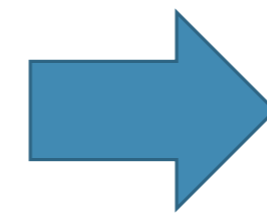
- Vacation credit was not allocated across multiple funding sources (REG like earn codes and VAC to salaries and wages)
- Vacation credit not posted to the funding source vacation was taken from but to the current funding source when vacation credit is processed. Crediting incorrect funding if funding distribution changed (called “*Leave in arrear*” issue).



### Incorrect Effort percent (%)

The dollar amount on the funding source is accurate but effort % is incorrectly calculated.

- Examples include
- Certain earn codes did not bear effort when they should (e.g. NNC & RSP)
- Partial salary cost transfers were processed with incorrect pay % and derived effort %.



## Solution Approach

### Mass Leave Correction Tool

Mass salary cost transfers will be centrally processed using MLC tool.

- Queries to capture errors where vacation credit was not recorded correctly and to show where they should have been posted.
- MLC tool will be used to correct payroll amount on funding only for two vacation issues described left (Note: MLC tool cannot be used for other mass salary cost transfers).

### Enhanced I-129

I-129 file used to load UCPATH payroll data to ERS includes correct effort % calculation logic.

- Additional logic and steps are added to re-calculate effort % to pass correct effort % to ERS through the enhanced I-129.
- As corrections are taking place during the loading process from UCPATH to ERS, effort % in the labor ledger will remain incorrectly as is but corrected effort % will be passed to ERS.

“These solutions do not address all UCPATH issues that may affect effort reporting but issues confirmed to affect accuracy of effort reports in magnitude.”

# Status of UCPath Issues affecting Effort Reports

## Issues resolved via enhanced I-129: No impact to accuracy of effort reports

### Issue type: Incorrect Effort Percent

- NNC, RSP earnings did not have derived effort percent and pay percent calculated.
- Partial direct retros caused incorrect derived effort percent and pay percent (treated at 100% effort when only partial dollars were moving).
- Derived effort percent greater than 100% when summarized by employee, employee record, pay end date.
- Pay percent greater than 9.999 or less than -9.999: these payroll lines were not loaded to ERS.
- Certain payroll transactions were missing OTC-Y indicator in the old I-129, resulting in inaccurate effort percent.
- Old I-129 did not extract all effort bearing rows and certain rows were skipped.

## Issues that will not be resolved when effort reports are released

### Issue type: Incorrect Dollar Amount

- Vacation credit was not allocated across multiple funding sources: REG like earn codes and VAC to salaries and wages (called “vacation allocation issue”).
- Vacation credit not posted to the funding source vacation was taken from but to the current funding source when vacation credit is processed. Crediting incorrect funding if funding distribution changed (called “Leave in arrear issue”).

### Issue type: Incorrect Effort Percent

- UCPath looks at a number of hours associated with a transaction line to calculate effort percent. Certain transactions are missing hours in the table even though they are processed with effort bearing earn codes, incorrectly resulting in zero effort.

“This is not a comprehensive list of all UCPath issues but a list of major issues affecting accuracy of effort reports.”

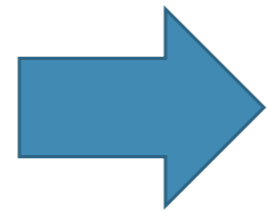
# Leave Allocation and Leave in Arrear Issues

## Solution Status

### Mass Leave Correction Tool

Mass salary cost transfers will be centrally processed using MLC tool.

- UCLA is in the process of reviewing the results of queries to confirm necessary salary cost transfers. Approximately 10 – 15% of effort reports are affected.
- MLC tool has been deployed to production after testing by UCPC, UCLA, UCSB.
- When MLCs are processed, direct retros cannot be processed. UCPC and campuses are reviewing regular pay run and direct retro jobs to schedule MLC run dates. MLC run schedules will be published once finalized.
- In the meantime, review and complete all pending old direct retros in UCPath. All direct retros in queue when MLCs are processed will be denied. For more details, refer to the CRU announcement sent 09/01/20  
**Subject:** [UCPath GL and Funding News] UCPath Mass Leave Correction – Salary Cost Transfer Cleanup



## Mitigation Plans

### Reports affected by leave issues

Do NOT certify until mass leave corrections are completed.

- Effort reports impacted by this issues will be flagged in the ERS, “Under Prelim Review” and the comment in the individual effort reports will state “Pending Mass Leave Correction (MLC) entry – Do not certify until additional instruction received from EFM”, .

Period	Employee	Department	Last Modified	Status	Under Prelim Review
Winter 18: Non-Academics	Gomez, Valeria Gonzalez (104522340)	Extramural Fund Management	08/25/2020 v2.2	Not Required	✓

- EFM will publish a report listing all individual effort reports impacted by this issue to EFM website.
- When MLCs are processed, affected effort reports will be automatically updated reflecting these corrections.
- If any effort reports were certified accidentally before MLCs are completed, these reports will be automatically reopened requiring re-certification (Certified/AdjustReqd).
- EFM will send the announcement when MLCs are completed and effort reports are ready for certification.

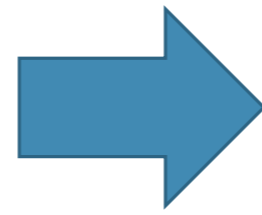
# Zero Effort Percent due to Missing Hours

## Solution Status

Enhanced I-129

Systematic correction is not available for this round of effort reporting periods.

- Phase I I-129 does not have this fix in place.
- Phase II I-129 will address this issue and is under development.
- Effort reports for this round of reporting periods were loaded to ERS using Phase I I-129 files. Effort reports impacted by “zero effort percent issue due to missing hours” require manual adjustments first to correct effort percent before certifying the report.
- Approximately 15 – 20% of effort reports are affected by this issue.



## Mitigation Plans

Reports Impacted by Missing hours

Certify effort reports after making manual adjustments.

- Effort reports impacted by this issues will be flagged in the ERS, “Under Prelim Review” and the comment in the individual effort reports will state “effort % is inaccurate on at least one record in the effort report. You will see one or more records showing either 0% or 9.9000% in the effort report detail.

Period	Employee	Department	Last Modified	Status	Under Prelim Review
Winter 18: Non-Academics	Gomez, Valeria Gonzalez (104522340)	Extramural Fund Management	08/25/2020 v2.2	Not Required	✓

- EFM will publish a report listing all individual effort reports impacted by this issue to EFM website.
- EFM will provide the job aid on how to recalculate and adjust effort % as well as an excel recalculation template.
- EFM will host a webinar to demonstrate manual adjustment using the excel template and the job aid. The date will be announced soon.

# Next Steps

- **EFM will announce key dates soon.**
  - Effort report release date and certification due date.
  - Mass Leave Correction job dates.
  - Webinar for special instructions to address zero effort percent due to missing hours.
  - All relevant details will be posted to EFM website.
- **Certify past due effort reports. Contact ERS Help Desk ([ershelp@research.ucla.edu](mailto:ershelp@research.ucla.edu)) for questions.**

Academic Year	The number of open effort reports
2014-2015 and prior	21
2015-2016	9
2016-2017	13
2017-2018	32
<b>Total</b>	<b>75</b>

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# **PAMS Enhancements**

Jennifer Iglesias

# PAMS Enhancements

Post Award Management System (PAMS): <https://pams.research.ucla.edu/>

- **Since PAMS Go-Live in February 2014, system developments and improvements continue to be made to serve the UCLA research community.**
- **Pages in PAMS were re-organized on 9/04/20 to better represent post award activities of an award.**
- **Information was organized into 6 key areas:**
  - 1) Worklist
  - 2) Award Overview
  - 3) Financial Deliverables
  - 4) Closeout
  - 5) Management Reports
  - 6) Administration

# Worklist

Worklist | Award Overview | Financial Deliverables | Closeout | Management Reports | Administration

Worklist | Fund Search

- **Department worklists will show financial deliverables requiring department action.**
  - Financial deliverables will appear with a status of “Pending Department Action”
  - EFM will indicate the information needed to proceed with submitting the invoice/financial report.

Award Snapshot	Fund Number	Sponsor Due Date	Status	Sponsor Award #	Sponsor
	82132	06/25/20	Pending Department Action		Janssen Rese

**Worklist** My Action Required

DASHBOARD

**Invoices and Reports Due to Sponsor**

- 1 (Total)
- 0 Upcoming 60 Days
  - 0 Interim
  - 0 Final
- 1 Past Due
  - 0 Interim
  - 1 Final

**Closeout Packets**

- 27 (Total)
- 5 Upcoming 60 Days
  - 3 Due to EFM
  - 2 Due to Home
- 22 Past Due
  - 22 Due to EFM
  - 0 Due to Home

Category	Type
Internal Financial Report	Final



- Timely action from Department fund managers and Management is important to comply with invoice or financial reports due dates.
- **Risk of non-compliance to submit invoices or financial reports on time includes the PI bearing financial responsibility to cover unreimbursed expenses incurred on the project.**

# Award Overview





Worklist | **Award Overview** | Financial Deliverables | Closeout | Management Reports | Administration

Notes Search | **Notes and Attachments** | Sponsor Sites

- **Notes and Attachments includes award notes and documents regarding financial activities**
  - Ex: Invoicing/financial reporting guidelines, sponsor’s invoice and/or financial report templates
  - Search for award notes by sponsor award number, PATS institution number, or by fund number.

Attachments  

Page 1 of 1 (4 items) << < [1] > >> Page size: 10

	Created Date	Latest Updated Date	User Name	Category	Comment	Attachment Name	History
☆	09/09/20 08:55 AM	09/09/20 08:55 AM	[blurred]	Budget	Updated budget as approved by sponsor	<a href="#">Budget v2.pdf</a>	
☆	09/09/20 08:50 AM	09/09/20 08:50 AM	[blurred]	Sponsor Template	Template for the monthly invoices.	<a href="#">Template.xlsx</a>	
★	09/09/20 08:46 AM	09/09/20 08:46 AM	[blurred]	Invoicing/Reporting Guidelines		<a href="#">Reporting Requirements.docx</a>	
☆	09/09/20 08:29 AM	09/09/20 08:29 AM	[blurred]	Correspondence	Correspondence between UCLA and sponsor about credits applied to fund	<a href="#">Award HDQMWR-17-C-0010 _ UCLA Fund 25119 - Restitution Checks.msg</a>	

- **Sponsor Sites: sponsor contact information on where invoices/financial reports will be submitted and the means of submission (e.g. email, sponsor system, mail, etc.)**

# Financial Deliverables

Worklist | Award Overview | **Financial Deliverables** | Closeout | Management Reports | Administration

**Basic Deliverables Search**

- Obtain copies of financial deliverables submitted to the sponsor or view the status of completion.
- Search financial deliverables by sponsor award number, PATS institution number, or fund number.
  - If an award has multiple fund numbers assigned, you will see the list of all funds associated to that award (e.g. NIH T32 Training Grant)

Institution	Fund	Award Number	Budget Period	Project Period	Sponsor
20174982	31535	5T32DA	07/01/19 - 06/30/20	07/01/18 - 06/30/23	NIH-NIDA National Institute on Drug Abuse
	29699	2T32DA	07/01/18 - 06/30/19	07/01/18 - 06/30/23	NIH-NIDA National Institute on Drug Abuse
20133507	31299	5T32DA	07/01/17 - 06/30/18	07/01/13 - 06/30/18	NIH-NIDA National Institute on Drug Abuse
	29919	4T32DA	<b>Fund: 31299</b> Budget Period(s): 07/01/17 - 06/30/18      Pending UCPATH: <a href="#">Yes</a>		
	29567	T32DA0			
	30429	T32DA0			
	29971	2T32DA			
20071764	30246	5T32DA			

Category	Type	Frequency	Due Date	Assigned To	Reassigned To	EFM Reviewer	Status	Status Updated	Document	Comments
Financial Report	Final	Once	09/30/2018				Submitted to Sponsor	08/12/2019		

# Closeout

Worklist | Award Overview | Financial Deliverables | **Closeout** | Management Reports | Administration

**COP Search** | Fund Balance and Approvals | Fund Attributes

- In the closeout section, you will find information on closeout packet (COP) and department approvals for linked departments and home accounts on a fund.

<b>Fund:</b> 21609 <b>Budget Period:</b> 04/16/18 - 04/15/19 <b>Project Period:</b> 04/16/15 - 04/15/19	<b>PI:</b> [Redacted] <b>Sponsor:</b> NASA-GODDARD SPACE FLIGHT CENTER <b>Sponsor Award No:</b> [Redacted]	<b>Department:</b> 1000-PHYSICS & ASTRONOMY <b>Closeout Packet Due to EFM:</b> 06/14/19 <b>Final Financial Deliverable Due to Sponsor:</b> 07/14/19
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**Expenditure Review**

[F&A Reconciliation](#)  
 ✓ [Fund Balance and Approvals](#)

**Linked Accounts** [Review](#)

[Redacted] -0965 ATMOSPHERIC AND OCEANIC SCIENCES

**Status Legend:** ✓ No Action Required ■ Action Required

- Fund Balance and Approvals**
  - View the status of closeout approvals and comments

**Fund Balance and Approvals**

**Approvals History**      Approval Comments:

Dept Preparer ([Redacted] Susan):	Approved by ([Redacted] Susan) on 06/13/2019
Dept Reviewer ([Redacted] Yasmin):	Approved by ([Redacted] Yasmin) on 06/14/2019
PI ([Redacted]):	<b>RAPID COP has been Uploaded</b>
EFM Preparer (Oswald, Clara):	Approved by (Oswald, Clara) on 08/08/2019
EFM Reviewer (Mott, Wilfred):	Approved by (Mott, Wilfred) on 03/04/2020

# Management Reports



- **Management Reports assist department administrators in managing portfolios.**
- **Reports are available for departments to download on-demand and are updated nightly.**
- **Expired Funds to Close**
  - Report contains funds that expired 120 days ago or earlier and have not been closed.
- **Fund Pending UCPATH Resolution:**
  - Report details which funds cannot be fiscally closed due to UCPATH issues and what issues are impacting each fund.
- **F&A Reconciliation**
  - Provides the financial reconciliation of a fund's indirect costs.

# Administration

Worklist | Award Overview | Financial Deliverables | Closeout | Management Reports | **Administration**

**Assignments** | Personnel

- In the Personnel tab, individuals with the “Department Administrator” role in PAMS can update assignments for personnel within each PAMS cluster.
- If you’re a fund manager and do not have access to a fund, review the “Assignments” page and request the Department Administrator to update assignments.

Function	User Roles	
	Fund Manager	Department Administrator
View individual worklists	X	X
Prepare, upload, and approve closeout packets (view linked department’s closeout packets)	X	X
View financial reports and invoices	X	X
Access to all funds in the cluster		X
View worklist for entire cluster		X
Manage assignments for cluster		X

Personnel Assignments

Default Owner:

Cluster Name:

Employee Name	User Role
Wright, Barbara	Department Administrator
Potts, Bill	Fund Manager
McCrimmon, James	Fund Manager
Smith, Sarah Jane	Fund Manager
Chesterton, Ian	Department Administrator
Yates, Michael	Fund Manager

# Access to PAMS

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- Department Administrators can request to add, remove, or update the role of a PAMS user <https://efm.research.ucla.edu/pams-access/>
- PAMS FAQ's: <https://efm.research.ucla.edu/pams-faq/>
- Contact our helpdesk with feedback or questions: [PAMSHelp@research.ucla.edu](mailto:PAMSHelp@research.ucla.edu)

# Any Questions?

## Contact Information

### EFM Website

<https://efm.research.ucla.edu>

### Yoon Lee

Phone: X40375

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

### ERS Help Desk

Email: [ershelp@research.ucla.edu](mailto:ershelp@research.ucla.edu)

### Jennifer Iglesias

Phone: x42846

Email: [jennifer.iglesias@research.ucla.edu](mailto:jennifer.iglesias@research.ucla.edu)

### PAMS Help

Email: [pamshelp@research.ucla.edu](mailto:pamshelp@research.ucla.edu)



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# Reminder about Iran Sanctions

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Aaron Taber  
Sr. Export Control Analyst  
[export.controls@research.ucla.edu](mailto:export.controls@research.ucla.edu)

September 10, 2020

# What are Sanctions?

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**Trade and Economic Sanctions:** limitations that the federal government imposes on countries or individuals that restrict certain transactions and activities that U.S. persons and entities – like UCLA – can undertake.

There are several types of sanctions programs:

- **Selective:** prohibitions directed against named individuals or entities within a country often via published lists (e.g., “Entity List” “Specially Designated Nationals” “Unverified List”), and
- **Comprehensive:** broad prohibitions on all transactions occurring within a named country
- **Comprehensively sanctioned countries:** [Iran](#), [Cuba](#), [North Korea](#), [Syria](#), and the [Crimea Region of Ukraine](#)

**OFAC:** Office of Foreign Assets Control; responsible for enforcing sanctions programs

# A Reminder about Sanctions

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*The Export Control Team will help determine if a specific OFAC license is required for a particular activity. If so, we will apply for one.*

**OFAC license:** grants permission for a U.S. person or entity to undertake an otherwise restricted activity or transaction

- **General:** broadly authorizes the performance of certain categories of prohibited activities (requires specific terms and conditions are met and documented)
- **Specific:** written authorization issued on a case-by-case basis to a particular person/entity authorizing a particular transaction (can take 6-12 months to obtain)

**Good news!** Depending on the country-specific regulations, some activities may require a specific license. If a specific license is needed, our office will prepare and submit a license request on your behalf. Contact us so we can review your plans in advance to make the right determinations: [export.controls@research.ucla.edu](mailto:export.controls@research.ucla.edu).

# A Reminder about Iran Sanctions

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***Iran Transactions and Sanctions Regulations (ITSR) are broad and may impact many UCLA activities. Email [export.controls@research.ucla.edu](mailto:export.controls@research.ucla.edu) for assistance.***

**ITSR:** a decades-old sanctions program the U.S. government has imposed on Iran that impacts many UCLA activities and transactions; not related to U.N. sanctions

In August 2020, Deans distributed a reminder memo to Schools describing the types of activities restricted under ITSR. Examples of prohibited activities (non-exhaustive):

- **attending or presenting** (*virtual or in-person*) at a conference or ceremony in Iran
- **conducting research or teaching** in Iran or for an Iranian entity
- **transferring funds, goods, or unpublished data** to or from Iranian entities

***Good news!*** Under ITSR, some activities may require a specific license. If a specific license is needed, our office will prepare and submit a license request on your behalf. Please contact us at [export.controls@research.ucla.edu](mailto:export.controls@research.ucla.edu) so we can review your plans in advance to make the right determinations.

# Summary

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***Federal trade and economic sanctions programs are broad and impact many UCLA activities and transactions.***

***Transactions involving comprehensively sanctioned countries (Iran, Cuba, North Korea, Syria, Crimea Region of Ukraine) require a case-by-case review by our office to safeguard the institution and UCLA individuals from civil and criminal penalties.***

***The Export Control Team in RPC can help you determine if an OFAC license is required for an activity, and then apply for it.***

***For assistance, please email [export.controls@research.ucla.edu](mailto:export.controls@research.ucla.edu) or call 310-794-6856.***

***We are here to help the UCLA community! Thank you.***