



# Research Administration Forum

---

July 14, 2022

# Welcome and Reminders

---

- 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
- Use the “raise hand” option to ask a question orally. You will be allowed to unmute.
- Slides will be posted on the ORA website following the meeting

# Agenda

- **Welcome & Announcements** – *Marcia Smith*
- **Research Policy and Compliance Update** – *Ann Pollack*
  - Department of Energy Interim Conflict of Interest Policy
- **Human Research Protection Program Hot Topics** – *Moore Rhys*
  - Launch of Phase 1b of BRUIN IRB
  - Scientific Review Policy
  - Good Clinical Practice Training Policy
- **Contract and Grant Administration** – *Kathy Kawamura*
  - Grant Updates
- **Extramural Fund Management** – *Katie Cadle*
  - Benefit Cost Transfer Processing Transition to EFM for Contract and Grant Funds
- **Open Forum – Questions, Discussion** – *All*

**UCLA**

**Research Policy & Compliance**

# Department of Energy Interim Conflict of Interest Policy

Ann Pollack, Associate Vice Chancellor - Research

RAF

July 14, 2022

# DOE COI Requirements

## Department of Energy Interim Conflict of Interest Policy Requirements for Financial Assistance

The DOE Interim Policy establishes standards that provide a reasonable expectation that the purpose, design, conduct, or reporting of projects funded under DOE financial assistance awards (e.g. grants, cooperative agreements or technology investment agreements) will be free from bias resulting from financial conflicts of interest or organizational conflicts of interest.



Department of Energy  
Financial Assistance Regulations

FINANCIAL ASSISTANCE LETTER

No. FAL 2022-02  
Date 12/20/2021

This Financial Assistance Letter is issued under the authority of the DOE and NNSA Senior Procurement Executives.

**Subject:** Department of Energy Interim Conflict of Interest Policy Requirements for Financial Assistance

**References:**

2 CFR part 910, Department of Energy (DOE) Financial Assistance Regulations

2 CFR part 200, e.g., 200.112, 200.318

# DOE Interim Policy Prompted Changes: UCLA Process for Collecting Disclosures related to DOE awards

## OLD

- Under Procedure 925.3 the PI and other investigators completed a Form 740U (Investigators' Statements of Financial Interests) and, as appropriate, the Disclosure Supplement
- Disclosures were submitted with every proposal.
- Disclosers determine if they have any financial interests related to the specific research being proposed.

## NEW

- Under Interim Policy 927 disclosures are made through eDGE
- Investigators disclose all related financial interests: teaching/education, research, outreach, clinical service, and University and public service on behalf of the University of California performed in the course and scope of the Investigator's UC appointment/employment.
- Initial disclosures are made prior to submission of proposals.
- If awards are made, the PI and other Investigators must update disclosures at least annually. New related financial interests or changes to financial interests are to be disclosed within 30 days

# Federal Disclosure Matrix Updates

## FEDERAL DISCLOSURE REQUIREMENTS

	NSF or Other Federal Agency (Excludes PHS & DOE)	PHS & DOE
<b>Reporting Triggers</b>	<ul style="list-style-type: none"> <li>NSF contract/grant for research and/or educational activity</li> <li>Other federal research contract/grant (except PHS &amp; DOE)</li> <li>Non-governmental entity that flows down federal funds (excluding PHS &amp; DOE funds and SBIR/STTR Phase I awards)</li> <li>California Institute for Regenerative Medicine (CIRM)</li> <li>UC Special Research Programs (e.g. MRPI, Tobacco, AIDS, Breast Cancer)</li> </ul>	<ul style="list-style-type: none"> <li>PHS contract/grant for research (including research contracts and grants, career development awards, center grants, individual fellowships, infrastructure awards, institutional training grants, program projects, research resource awards and conference grants)</li> <li>Grant from other non-federal sponsors that adopt the PHS policy (such as Alliance for Lupus Research, American Cancer Society, American Heart Association, Arthritis Foundation, and Susan G. Komen for the Cure)</li> <li>DOE-funded financial assistance awards (e.g., a grant, cooperative agreement, or technology investment agreement) issued on or after June 18, 2022</li> </ul>
<b>Who Must Disclose</b>	<ul style="list-style-type: none"> <li>UCLA Principal Investigator(s)</li> <li>Other Investigators (others who share responsibility for design, conduct, or reporting of the results of a sponsored project)</li> </ul>	<ul style="list-style-type: none"> <li>UCLA Principal Investigator(s)</li> <li>Other Investigators (others who share responsibility for purpose*, design, conduct, or reporting of the results of a sponsored project)</li> </ul> <p>* The term purpose is an addition to the definition by DOE only.</p>
<b>What to Disclose</b>	<p>Significant Financial Interests* (see below)</p> <ol style="list-style-type: none"> <li>That would reasonably appear to be affected by the research (or educational activities) funded or proposed for funding; or</li> <li>Are in entities who financial interests would reasonably appear to be affected by such activities</li> </ol>	<p>Significant Financial Interests** (see below) related to the Investigator's institutional responsibilities:</p> <p>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</p>

- <https://rpc.research.ucla.edu/wp-content/uploads/coi-disclosure-matrix.pdf>

# EPASS Changes

EPASS now includes references to DOE policy

## 7. Additional Forms Required

Yes	No	COI (Disclosure Requirements)
<input type="checkbox"/>	<input type="checkbox"/>	Sponsor/Prime Sponsor is Federal <b>Public Health Service (PHS)</b> , agency that has adopted the PHS regulations, or <b>Department of Energy</b> ? If yes, provide names of other investigators on <b>page 3</b> (See <b>UCLA Policies 926 and 927</b> )
<input type="checkbox"/>	<input type="checkbox"/>	Sponsor/Prime Sponsor is Federal (other than PHS), CIRM or special research programs managed by the UC Research Grants Program Office (RGPO)? If yes, attach COI <b>Form 740 &amp; Supplement to Form 740</b> (if applicable). See <b>UCLA Procedure 925.3</b> .
<input type="checkbox"/>	<input type="checkbox"/>	Non-Government Sponsor/Prime Sponsor? If yes and project is <b>Research</b> , attach <b>Form 700-U, 700-U Addendum and 700-U Supplement</b> , as applicable, unless sponsor is <b>exempt</b> . See <b>UCLA Procedure 925.2</b>

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

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

\*The term purpose is an addition to the definition by DOE only.

# UCLA Interim Policy 927

## UCLA Policy 927 : Interim Policy - Conflicts of Interest in Department of Energy Funded Projects

Issuing Officer: Vice Chancellor - Research & Creative Activities

Responsible Office: Research Policy and Compliance - [Look Up Contact Person](#)

Effective Date: June 23, 2022

Revision History: [APP History](#)



### I. PURPOSE & SCOPE

This Policy implements the 2022, U.S. Department of Energy Interim Conflict of Interest Policy Requirements for Financial Assistance. The DOE Interim Policy establishes standards that provide a reasonable expectation that the purpose, design, conduct, or reporting of projects funded under DOE financial assistance awards (e.g. grants, cooperative agreements or technology investment agreements) will be free from bias resulting from financial conflicts of interest or organizational conflicts of interest.

This Policy applies to the Principal Investigator and all other Investigators (regardless of position or title) who are responsible for the purpose, design, conduct or reporting of a project funded under a DOE Financial Assistance Award (FOA). DOE Program Offices have the discretion of requesting that others who are participating on the project are also covered by this Policy.

This Policy applies to all DOE funding opportunity announcements issued after June 18, 2022, and to all new and renewal awards selected from those FOAs. This Policy does not apply to awards made by the Office of Indian Energy, and Phase 1 SBIR/STTR awards.

UCLA Policy 927 complements UCLA Policies 925 and 926.

## Interim Policy - Conflicts of Interest in Department of Energy Funded Projects

Issued on June 28, 2022

Reflects changes in UC Policy on Disclosure of Financial Interests & Management of Conflicts of Interest, Public Health Service Research Awards revised on June 17, 2022 to indicate that it also applies to DOE support.

# Disclosures

## UCLA Policy 927 : Interim Policy - Conflicts of Interest in Department of Energy Funded Projects

Issuing Officer: Vice Chancellor - Research & Creative Activities  
Responsible Office: Research Policy and Compliance - [Look Up Contact Person](#)  
Effective Date: June 23, 2022  
Revision History: [APP History](#)



### I. PURPOSE & SCOPE

This Policy implements the 2022, U.S. Department of Energy Interim Conflict of Interest Policy Requirements for Financial Assistance. The DOE Interim Policy establishes standards that provide a reasonable expectation that the purpose, design, conduct, or reporting of projects funded under DOE financial assistance awards (e.g. grants, cooperative agreements or technology investment agreements) will be free from bias resulting from financial conflicts of interest or organizational conflicts of interest.

This Policy applies to the Principal Investigator and all other Investigators (regardless of position or title) who are responsible for the purpose, design, conduct or reporting of a project funded under a DOE Financial Assistance Award (FOA). DOE Program Offices have the discretion of requesting that others who are participating on the project are also covered by this Policy.

This Policy applies to all DOE funding opportunity announcements issued after June 18, 2022, and to all new and renewal awards selected from those FOAs. This Policy does not apply to awards made by the Office of Indian Energy, and Phase 1 SBIR/STTR awards.

UCLA Policy 927 complements UCLA Policies 925 and 926.

The electronic Disclosure Gateway (eDGE) developed at UCLA to implement the Public Health Service Regulations on Objectivity in Research has been modified so that it can also be used by DOE PIs and other Investigators.

- ▶ **Login**
- ▶ **How to Access the System**
- ▶ **Quick Reference Guides & Training Materials**
- ▶ **Contact Us**

**Disclosure Quick Guide** For a step by step guide on how to use the system, please reference our user quick guide.

**Reference Materials:**

- Conflict of Interest Policies and Procedures
- List of PHS Research Sponsors
- List of PHS Award Mechanisms

**Investigator Briefing:** Please note, this is a reference only. To comply with the Training requirement, please login to eDGE.

**Frequently Asked Questions**

# Accessing eDGE

<https://coi.research.ucla.edu/COI> > Home > Quick Reference Guide & Training Materials

See [Disclosure Quick Guide](#) for step-by-step instructions

# Training Requirement

PHS and DOE disclosures now both done through eDGE

**eDGE**  
Electronic Disclosure Gateway

You Are Here: 📄 Annual Disclosure Certificatio...

<< Back Save | Exit | Hide/Show Errors | Print... | Jump To: Training Introduction ▾

## INTRODUCTION

The eDGE system was created to facilitate UCLA's compliance with the [U.S. Public Health Service regulations on Promoting Objectivity in Research](#). In 2022, the system was updated to include the U.S. [Department of Energy's \(DOE\)](#) interim Conflict of Interest (COI) policy.

Investigators on awards from [Research Sponsors that Require Compliance with PHS Regulations](#) who will share responsibility for design, conduct or reporting of the project must disclose all personal (or individual) financial interests that meet the PHS definition. DOE adopted an interim COI policy that aligns closely with the PHS conflict of interest rules.

Investigators must also complete a training session prior to participating in research related to any PHS or DOE -funded project. UCLA Policy 926, "PHS Regulations on Objectivity of Research," implements the 2011 PHS regulations. The 2022 DOE interim policy is covered by Policy 927. Under Policy 927, Investigators must disclose financial interests that fall within the reporting categories and meet thresholds that PHS and DOE define as "Significant Financial Interests." This is explained below.

## Training

eDGE training module now contains DOE and PHS information.

# Two new questions in eDGE related to DOE investigators

Are you an Investigator on any proposals or active awards funded by DOE?

Yes  No [Clear](#)

\* Provide your title:

*Example (Professor, Post-Doctoral Scholar, Project Scientist)*

I understand that this Disclosure is required to obtain funding from the U.S. Government.

I, **Josephine F. Bruin**- Project Scientist, certify to the best of my knowledge and belief that the information contained in this Disclosure Statement is true, complete, and accurate. I understand that any false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims, or otherwise. (18 U.S.C. §§ 1001 and 287, and 31 U.S.C. 3729-3730 and 3801-3812). I further understand and agree that (1) the statements and representations made herein are material to U.S. Government's funding decision, and (2) I have a responsibility to update the disclosures during the period of performance of the award should circumstances change which impact the responses provided above:

Agree [Clear](#)

*Note: This attestation appears because "yes" was checked for Q.3. on the previous page: "What to Disclose". If this does not apply, use the "Jump To" drop down, select that page, and check "No".*

## Identification

DOE Investigators must identify themselves and enter their academic title. For example, Professor, Post-Doctoral Scholar, Project Scientist, et.

## Attestation

DOE requires that a specific attestation be completed with each new disclosure or update to an existing one.

# Updates to the ORA Portal

This will be updated to  
“PHS & DOE COI  
Certification Status  
Report”

### REPORTS

- PHS COI Certification Status Report
- IRB Protocol Review Status Report  
By: Department, PI, Protocol #, Grant, Sponsor, etc.
- Effort Report Certification Status
- Salary Cap Reports  
Overpayment/Disallowance Report **Retired**  
Current Salary Cap Rate  
Historical Salary Cap Rates  
Sponsors Subject to Salary Cap

### TOOLS

- CITI Training Lookup Tool
- Online IRB Protocol Management (webIRB)
- On-line ARC Protocol Management (RATS)
- Electronic Disclosure Gateway (eEDGE)
- IRB RAND MOU Database
- IRB Emergency Use Database
- Embryonic Stem Cell Research Committee (ESCRO) Online Review

### FORMS

- Conflict of Interest Disclosures
- Forms to Upload in webIRB



# Questions?

---

## Website URL

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

## Ann Pollack

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

## COI Team

Email: [COI@reserach.ucla.edu](mailto:COI@reserach.ucla.edu)



# OHRPP WebIRB Updates & Announcements

---

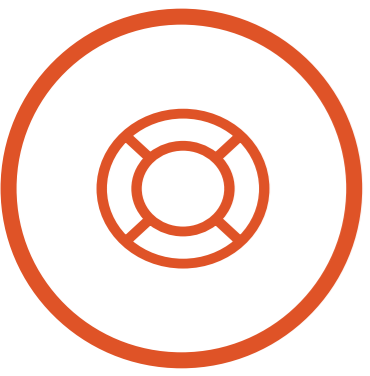
July 14, 2022

# OHRPP Updates

**WebIRB Update** 

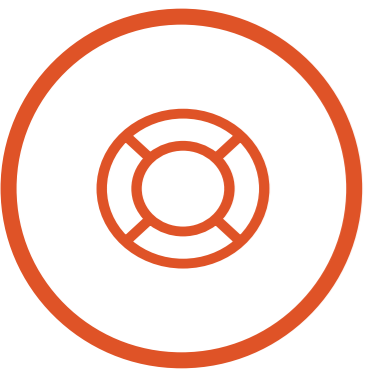
**OHRPP Announcements** 

**Human Research News** 



## webIRB Update

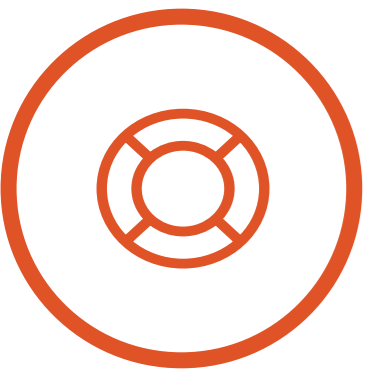
- ***In support of new UCLA Policies 916 & 917***, ORIS has updated a few functions in webIRB.
- The policies are effective as of 6/30/2022, and we anticipate a BruinPost from Vice Chancellor for Research and Creative Activities announcing these policies soon.
- These new functions **will go live in webIRB on July 22, 2022**
- webIRB will be down for a few hours in the late afternoon on July 21, 2022 in order for ORIS to update the system. A reminder about the downtime will be posted in webIRB.



# webIRB Update – SRC (Policy 916)

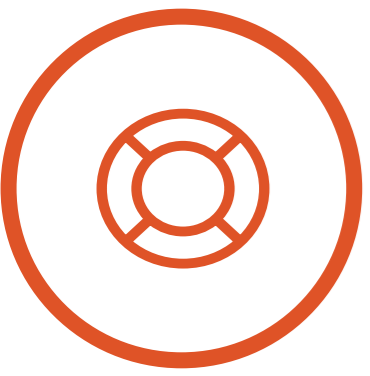
- **Summary of the Policy:**
  - Establishes a new process for *required review of clinical trial protocols\** by an internal, independent scientific review committee
    - Excludes studies that have received external scientific review
    - Excludes studies that are reviewed by ISPRC For complete review criteria and workflow, please see [this chart](#)
  - Review will be **sequential**. When applicable, SRC review will come first then IRB review.

\* Protocols that meet the [NIH definition of a clinical trial](#)



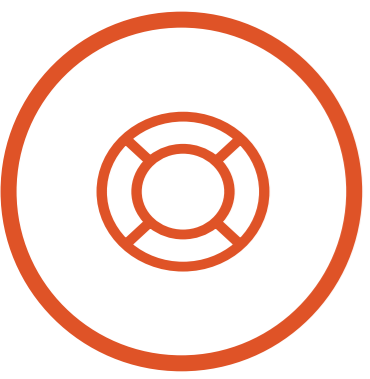
## webIRB Update – SRC (Policy 916)

- ***Operationalizing of the Policy:***
  - When a new application (that meets the requirement for CTSI SRC review) is submitted to the IRB through webIRB, it will be re-routed in the webIRB system for review by the SRC.
  - Once the SRC process is completed, the SRC signs off on the protocol and it moves along to IRB review



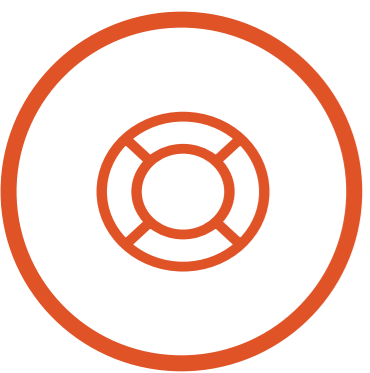
## webIRB Update – GCP (Policy 917)

- ***Summary of the Policy:***
  - Establishes a new training requirement for key personnel conducting research that meets the NIH definition of a clinical trial
  - *This expands the previous requirement for GCP training for key personnel on NIH-funded clinical trials to key personnel conducting clinical trials, **regardless of funding source***



## webIRB Update – GCP (Policy 917)

- ***Operationalizing of the Policy:***
- The webIRB system will conduct an ***automatic check*** to ensure GCP training has been completed by key personnel when:
  - An initial application is submitted
  - When an amendment is submitted
  - When the “edit study personnel” function is used
- This automatic check will follow the same process as the check for human subjects training already in place.



## webIRB Update – GCP (Policy 917)

As a reminder:

- GCP training is completed through [CITI](#)
- ***GCP training can meet both the GCP requirement AND the human subjects training requirement.***
- ***For this reason, we recommend that key personnel conducting clinical trials consider using GCP training to meet their minimum requirements for human subjects training***
- For more details on GCP training, please review [this page](#)



# Learn at Lunch

## “Operationalizing UCLA Policies 916 & 917”

July 28, 2022 at noon

joint presentation by CTSI SRC and OHRPP

[Register for the zoom link](#)

31

## Reminder – BruinIRB Phase 1b launched 7/1/2022

- All new abbreviated applications (HUD, RTT, Emergency Use, Expanded access) *as well as all reliance applications* should now be submitted via [BruinIRB](#)
- Please bookmark OHRPP's [Electronic Submission Systems webpage](#) for the current status of the BruinIRB roll-out

31

## OHRPP 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, July 19, 2022 8:30am
  - Tuesday, August 2, 2022 8:30am

Register once and you can join any session.



## Subscribe to *Human Research News*

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](#)



# Contact

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



# Grant Updates

---

July 14, 2022

# Department of Energy

## FAL 2022-04 (Current & Pending Disclosures)

### **Current & Pending Support**

“(a) All resources made available, or expected to be made available, to an individual in support of the individual’s RD&D efforts, regardless of (i) whether the source is foreign or domestic; (ii) whether the resource is made available through the entity applying for an award or directly to the individual; or (iii) whether the resource has monetary value; and (b) includes in-kind contributions requiring a commitment of time and directly supporting the individual’s RD&D efforts, such as the provision of office or laboratory space, equipment, supplies, employees, or students.

This term has the same meaning as the term Other Support as applied to researchers in NSPM-33: For researchers, Other Support includes all resources made available to a researcher in support of and/or related to all of their professional RD&D efforts, including resources provided directly to the individual or through the organization, and regardless of whether or not they have monetary value (e.g., even if the support received is only in-kind, such as office/laboratory space, equipment, supplies, or employees). This includes resource and/or financial support from all foreign and domestic entities, including but not limited to, gifts provided with terms or conditions, financial support for laboratory personnel, and participation of student and visiting researchers supported by other sources of funding.”

# DOE OTHER SUPPORT

**DOE Current & Pending Support-** All sponsored activities, awards, and appointments, whether paid or unpaid; provided as a gift with terms or conditions or provided as a gift without terms or conditions; full-time, part-time, or voluntary; faculty, visiting, adjunct, or honorary; cash or in-kind; foreign or domestic; governmental or private-sector; directly supporting the individual's research or indirectly supporting the individual by supporting students, research staff, space, equipment, or other research expenses. All involvement in foreign government-sponsored talent recruitment programs must also be identified.

- **Applicability: Current & Pending Support submitted on or after June 1, 2022**
  - DOE & National Nuclear Security Administration (NNSA) research, development, and demonstration (RD&D) activity awards
- **Award Lifetime C&P Management Required**
  - Within 30 days of change, submit updated Current & Pending Support
    - Change to Senior/Key Personnel
    - Changes to previously submitted Current & Pending Support
- **New Investigator Certification Statement**
  - DOE specific certification statement required (signature & date)

# Department of Energy

## Certification Statement

Must be Signed, Dated, and Appended to the [Approved NSF Fillable Current & Pending Support PDF](#) (should be submitted as 1 pdf) [FAQs on using NSF Fillable PDF](#)

“I, [Full Name and Title], certify to the best of my knowledge and belief that the information contained in this Current and Pending Support Disclosure Statement is true, complete, and accurate. I understand that any false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (18 U.S.C. §§ 1001 and 287, and 31 U.S.C. 3729-3733 and 3801-3812). I further understand and agree that (1) the statements and representations made herein are material to DOE’s funding decision, and (2) I have a responsibility to update the disclosures during the period of performance of the award should circumstances change which impact the responses provided above.”



Future enhancement: Once updated, [SciENcv](#) will automatically attach the DOE certification statement.  
[SciENcv FAQs](#)

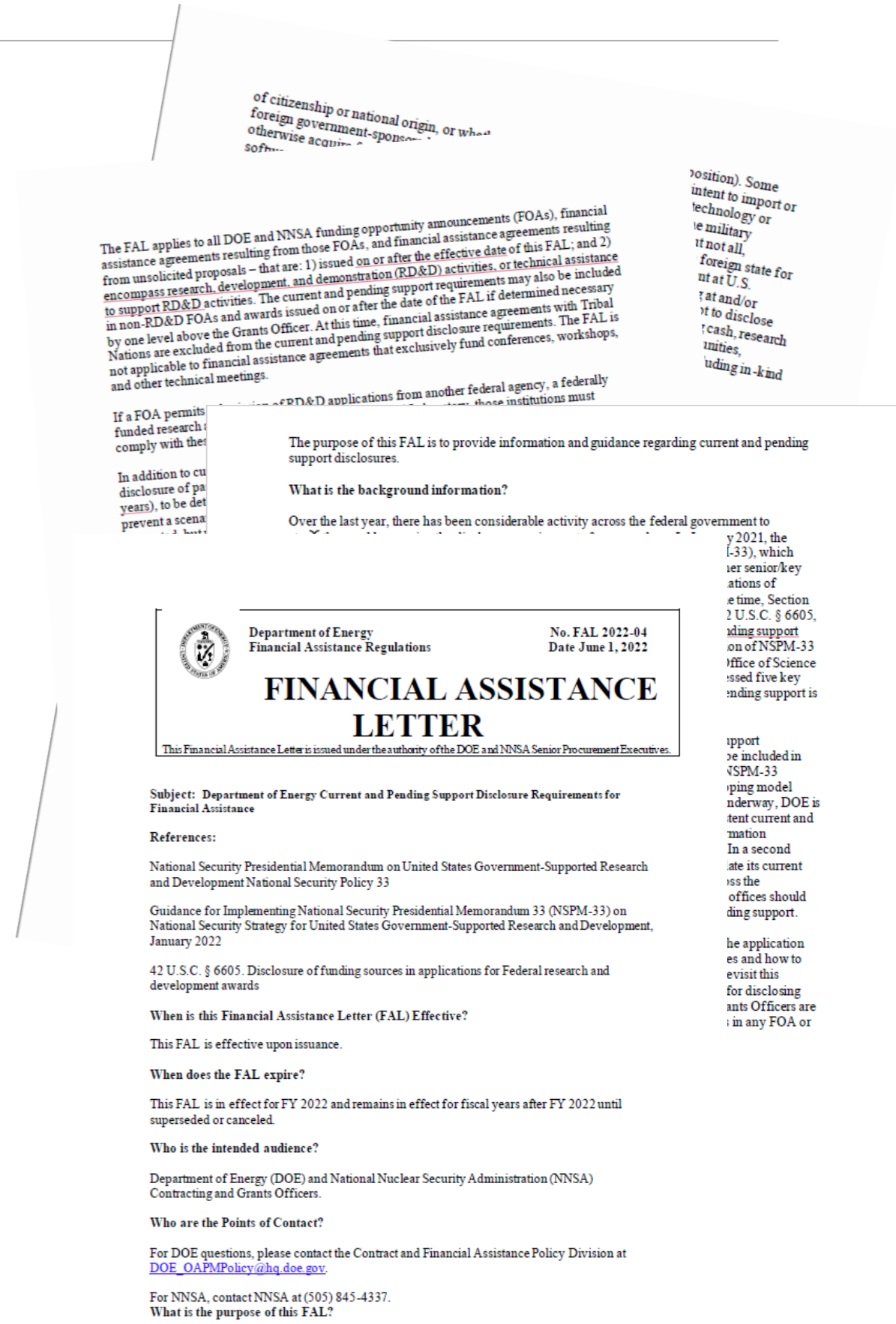
# Department of Energy

## DOE & NNSA Grant Officer Discretion

- May request Current & Pending Support throughout the life of the award for non RD&D awards
- May request additional details/documents of foreign agreements
- May request disclosure of Past Support (~5 year)
- Any additional requirements for disclosures in the agreement

## FUTURE ENHANCEMENTS

- SciENCv is currently working on an update to include the new DOE specific certification language systematically through Current & Pending Support documents compiled and managed via [SciENCv](#)



# NIH

## NIH FY22 (October 1 – September 30)

Applicants will be notified (primarily by e-mail) when Just-in-Time information is needed. This notification is not a Notice of Award nor should it be construed to be an indicator of possible funding. Applicants should only submit this information when requested.

[https://grants.nih.gov/grants/policy/nihgps/html5/section\\_2/2.5.1\\_just-in-time\\_procedures.htm](https://grants.nih.gov/grants/policy/nihgps/html5/section_2/2.5.1_just-in-time_procedures.htm)




Helpful Tip: If you require human/animal or other subject approval, it is best practice to work with associated central office managing the approvals early.

# OCGA Automated Notification

## Adding the Department Contact (PAMS Preparer)

### Notes and Attachments

<b>Institution Number:</b> [Redacted]	<b>Sponsor:</b> SOUTHWEST RESEARCH INSTITUTE	<b>Dept Title (Code)</b> [Redacted]
<b>Award Snapshot:</b> 	<b>Sponsor Award:</b> [Redacted]	<b>Dept. Contact:</b> [Redacted]
<b>Award Status:</b> Closed	<b>Project Period:</b> 07/01/17 - 01/31/19	<b>EFM Contact:</b> [Redacted]
<b>Payment Basis:</b> Cost Reimbursable	<b>PI:</b> [Redacted]	<b>Billing Site:</b> No Associated Billing Site
<b>Restricted CF:</b> No	<b>Prime Sponsor:</b> [Redacted]	<b>Dunning Site:</b> No Associated Dunning Site
<b>Federal Advance:</b> No		

## Automated Notifications

Automated Notification	Recipients
Award Received Notification	To: PI, Departmental Post-Award Email Address CC: <b>PAMS Preparer</b> , Varying Central Administration addresses
Awarded/Fully Executed Notification	To: PI, Departmental Post-Award Email Address CC: <b>PAMS Preparer</b> , Varying Central Administration addresses
Non-Financial Deliverable Due Reminder	To: PI CC: <b>PAMS Preparer</b> , Departmental Post-Award Email Address



# CAMPUS TRAINING

<https://ocga.research.ucla.edu/training-calendar/>

## July

### NIH Assist Basics from the Preparers Perspective

Wednesday, July 20, 2022

9:30am-11:00 am

This session will provide a preparer's perspective on how to utilize NIH's proprietary proposal submission system (ASSIST) for Multi-Project Applications (MPA). It is suggested that attendees acquaint themselves with the SF424 sections 4, 5 & 9 along with an FOA prior to class. This session will address basic functions of the system along with hints and tips for the department preparers and PIs to employ, ensuring an on-time compliant (error-free) application.

# Any Questions?

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



# Extramural Fund Management

---

July 14, 2022

# BCT Processing Transition to EFM for C&G Funds

# Benefit Cost Transfer Processing Transition


- **Effective July 1, 2022, processing of Benefit Cost Transfer (BCT) journals to remove unallowable benefits or General, Automotive, and Employment Practices Liability (GAEL) impacting Contract and Grant (C&G) funds will transition to Extramural Fund Management from the Central Resource Unit.**
- **Transition communicated to campus:**
  - [ORA News announcement](#) on June 28, 2022
    - Email Subject: Benefit Cost Transfer Processing Transition to EFM for Contract and Grant Funds
  - [Central Resource Unit announcement](#) on July 1, 2022
  - Central Resource Unit Newsletter - Volume 4 Issue 1 on July 5, 2022
- **CRU will continue to process BCT journals impacting non-C&G funds following existing procedure on the [CRU website](#).**

# When is a BCT Needed for C&G Funds?

- **A BCT is required to remove unallowable benefits and GAEL from C&G funds to departmental unrestricted funding in cases where the sponsor has deemed the expenses unallowable.**
- **Examples:**
  - Unallowable Composite Benefit Rate (CBR) on NRSA Training Grants
  - Sponsor caps benefits at a rate lower than is assessed in the payroll ledger
  - Unallowable GAEL on non-federal
- **If salary is being transferred, then a Direct Retro in UCPath is required and associated benefits are transferred accordingly in UCPath. A BCT financial journal is not necessary.**

# New BCT Financial Journal Template

- EFM created a **new simplified BCT excel journal template** to streamline the review, approval, and posting process.
- **Excel template** is available on the EFM website under **Closeout Resources**.

Benefit Cost Transfer (BCT) Financial Journal	Financial journal template, justification questions, and supporting documentation to be completed by the department and submitted to EFM when transferring unallowable benefit or GAEL expenses off C&G funds.	
--	--	---



- **Workbook contains instructions on how to fill out the BCT financial journal template, a sample template along with the blank financial journal template, and justification questions.**

# BCT Excel Template Changes and Examples

- **Key changes:**
  - Template is similar to Non-Payroll financial journal.
  - Users enter transactions, including only debit and credit expenses.
  - No longer need to download Benefit Cost Transfer Template report in Campus Data Warehouse.
  - Transactions are not required to be broken out by Earn Date or employee, as long as backup provided clearly indicates individual transactions included in the BCT journal.

Journal Description: To remove unallowable benefit expenses from 12345. Confirmed by Josie Bruin.

BCT: F: From FAU T: To FAU

LOC	Account	CC	Fund	Project	Sub	Obj	Source	Description	Reference	Debit	Credit
4	111111	AA	12345		03	3380		BCT: F:12345 T:98765			5.00
4	111111	AA	12345		03	3385		BCT: F:12345 T:98765			5.00
4	111111	AA	12345		03	3390		BCT: F:12345 T:98765			5.00
4	111111	AA	12345		06	8850		BCT: F:12345 T:98765			100.00
4	999999	ZZ	98765		03	3380		BCT: F:12345 T:98765		5.00	
4	999999	ZZ	98765		03	3385		BCT: F:12345 T:98765		5.00	
4	999999	ZZ	98765		03	3390		BCT: F:12345 T:98765		5.00	
4	999999	ZZ	98765		06	8850		BCT: F:12345 T:98765		100.00	

The original expense is recorded to C&G fund 12345. Rows 14-17 will remove these expenses from the C&G FAU and rows 18-21 will transfer the expenses to the departmental unrestricted FAU.

# Justification Questions

- Justification questions have been streamlined:

*Provide the 3 justifications, as applicable, for EACH Journal Entry request from Journal Tab. Copy & paste additional rows as necessary.*

Explanation of Expenditure Adjustment, State:		Department Response:
Why is the transfer is being requested? If partial transfer, explain the basis for proration and/or split.	1)	
Who approved the transfer of funds?	2)	
Explain the untimeliness if the transfer is > 120 days after original transaction date, and/or > 90 days after the fund end date.	3)	

# Submission and Approval Process

---

- **To request a BCT journal, submit the following documents to your [EFM Accountant](#).**
  - BCT financial journal template with complete journal justifications
  - Payroll report clearly identifying transactions to be transferred
  - Detail general ledger *when transferring GAEL expenses*
  - Approval from Graduate Division *when transferring Fee Remissions*
- **EFM will review the template, journal justifications, and backup documentation for accuracy.**
- **When approved, EFM will post financial journal to the UCLA Financial System.**
- **Reach out to your EFM Accountant with any questions.**

# Any Questions?

## Contact Information

### EFM Website

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

### Katie Cadle

Phone: (310) 794-0223

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



# July 2022 Research Administration Forum Q&A

## Extramural Fund Management

### **Q1: Will BCT ever be available in UCPATH or will we always be processing journals?**

A1: As of now, UCLA is not planning to turn on the Benefit Cost Transfer (BCT) feature in UCPATH due to a limited approval workflow available in the UCPATH system. Until a different approval workflow can be made available for BCT from the current approval workflow for high risk Salary Cost Transfers (SCT) in UCPATH, UCLA will continue to process Benefit Cost Transfers via Financial Journal.

### **Q2: Is it an issue if we wait at the end of each budget period to move the unallowable to an unrestricted?**

A2: As long as the department is doing monthly reconciliation and accounting for unallowable benefits that will be moved off to calculate the total expenditures and the unexpended balance, Benefit Cost Transfers (BCT) can be submitted to EFM at the end of the budget period. Otherwise, BCT at the last minute can leave an unintended unexpended balance and there will be no time left to spend.

### **Q3: Can we submit BCT journals to EFM for unallowable GAEL expenses incurred prior to July 2022?**

A3: Yes, effective July 1, 2022, EFM will process all Benefit Cost Transfers (BCT) impacting Contract and Grant (C&G) funds, including GAEL regardless of the Effective Date of the expense in the General Ledger.