



Research Administration Forum

November 10, 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 Data Working Group** – *Lisa Snyder*
 - Resources to Support Data Sharing Requirements
- **Contract and Grant Administration Hot Topics** – *Tracey Fraser*
 - OCGA Updates – *Kathy Kawamura*
- **Extramural Fund Management Hot Topics** – *Yoon Lee*
 - The New Final Financial Deliverable Procedure
- **Open Discussion**

UCLA

Research Administration

Grant Updates

NOVEMBER 7, 2022

Standard Application Deadlines

(01/25/2022 - 01/24/2023)

Upcoming NIH Cycle 2022

Activity Code	Program Description	Due Date
P Series - ALL	Program Project/Center Grants	September 25
T Series - ALL	Institutional Training Grants	September 25
R01 – New	Research Grants	October 5
U01 - New	Research Grants - Cooperative Agreements	October 5
K01 - New	Research Career Development	October 12
R21 - New	Research Grants	October 16

Activity Code	Program Description	Due Date
R01 – Renewal, Resubmission, Revision	Research Grants	November 5
U01 - Renewal, Resubmission, Revision	Research Grants - Cooperative Agreements	November 5
K01 - Renewal, Resubmission, Revision	Research Career Development	November 12
R21 – Resubmission, Revision	Research Grants	November 16
F – New, Renewal, Resubmission	Individual National Research Service Awards	December 8

NIH – Forms H

(01/25/2023 - until amended)

Standard Application Deadlines

Upcoming NIH Cycle 2022

Activity Code	Program Description	Due Date
P Series - ALL	Program Project/Center Grants	January 25
T Series - ALL	Institutional Training Grants	January 25
R01 – New	Research Grants	February 5
U01 - New	Research Grants - Cooperative Agreements	February 5
K01 - New	Research Career Development	February 12
R21 - New	Research Grants	February 16

Activity Code	Program Description	Due Date
R01 – Renewal, Resubmission, Revision	Research Grants	March 5
U01 - Renewal, Resubmission, Revision	Research Grants - Cooperative Agreements	March 5
K01 - Renewal, Resubmission, Revision	Research Career Development	March 12
R21 – Resubmission, Revision	Research Grants	March 16
F – New, Renewal, Resubmission	Individual National Research Service Awards	April 8

NOT-OD-22-195 Forms H – Due for applications due on or after January 25, 2023
Forms H Application Packages to be released by November 25, 2022
or 30 calendar days prior to the proposal deadline

Major Changes

Requirement for Data Management and Sharing Plan (& potential future plans)

Modular Budget

Research Plan

Career Development Award Supplemental Form

Research Training Program Plan

Fellowship Supplemental Form

Other Plan(s): New Fields created for Upload

Single PD/PI to Multiple PI (MPI) Instructions (Renewal & Resubmission)

Research Plan

Research Training Program Plan

NIH – Forms H

Forms H - High Level Form Summary

	<p>Plan Sections</p> <ul style="list-style-type: none"> The NIH Data Management and Sharing Plan will be provided in this new attachment. Updated instructions accordingly.
Form	Changes
SF424 (R&R) Form	<ul style="list-style-type: none"> No form change
SF424 R&R Multi-project Form	<ul style="list-style-type: none"> No form change
R&R Senior/Key Person Profile (Expanded) Form	<ul style="list-style-type: none"> No form change
R&R Budget Form	<ul style="list-style-type: none"> Within section F. Other Direct Costs, added instructions for NIH applications submitting a Data Management and Sharing Plan noting that requested “Data Management and Sharing Costs” must be noted as a single line item Within section L. Budget Justification, added instructions for NIH applications submitting a Data Management and Sharing Plan to include a brief Data Management and Sharing Justification
R&R Subaward Budget Attachment(s) Form	<ul style="list-style-type: none"> No form change
PHS Form 101 (Human Subjects and Clinical Trials Information)	<ul style="list-style-type: none"> Updated Expiration Date
PHS Assignment Request form	<ul style="list-style-type: none"> Updated Expiration Date

NIH – Forms H

Annotated Forms H

APPLICATION FOR SF 424 (R)

1. TYPE OF SUBMISSION
 Pre-application
 Other (Specify):
 Small Business Organization
 New Renewal

2. DATE SUBMITTED
 Do not use Pre-application specifically noted in the instructions.

5. APPLICANT INFORMATION
 Legal Name: []
 Department: []
 Street1: []
 Street2: []
 City: []
 State: []
 Country: USA: UNITED STATES
 Person to be contacted:
 Prefix: []
 Last Name: []
 Position/Title: []
 Street1: []
 Street2: []
 City: []
 State: []
 Country: USA: UNITED STATES
 Phone Number: []
 Email: []

6. EMPLOYER IDENTIFICATION

7. TYPE OF APPLICATION
 Other (Specify):
 Small Business Organization

8. TYPE OF APPLICATION
 New Renewal

9. NAME OF FEDERAL AGENCY

11. DESCRIPTIVE TITLE
 If Revision provide

12. PROPOSED PROJECT
 Start Date: []
 End Date: []

RESEARCH PROJECT INFORMATION
 Prefix: []
 * Last Name: []
 Position/Title: []
 Organization Name: []
 * Street1: []
 Street2: []
 * City: []
 * State: []
 * Country: USA: UNITED STATES
 * Phone Number: []
 * E-Mail: []
 Credential, e.g., agency logo: []
 * Project Role: PD/PI
 Degree Type: []
 Degree Year: []
 * Attach Biographical Sketch
 Attach Current & Pending

1. Are Human Subjects Involved?
 1.a. If YES, Is the research involving human subjects?
 2. Are Vertebrate Animals Involved?
 2.a. If YES, Is the research involving vertebrate animals?
 3. Is proprietary information involved?
 4.a. Does this project involve the use of vertebrate animals?
 4.b. If yes, please describe the use of vertebrate animals.
 4.c. If this project involves the use of vertebrate animals, describe the environment in which the animals will be housed.
 4.d. If yes, please describe the care and use of the animals.
 5. Is the research involving human subjects?
 5.a. If yes, please describe the research.
 6. Does this project involve the use of vertebrate animals?
 6.a. If yes, identify the vertebrate animals to be used.
 6.b. Optional: Describe the use of vertebrate animals.
 7. Project Summary
 8. Project Narrative
 9. Bibliography
 10. Facilities & Equipment
 11. Equipment
 12. Other Attachments

Introduction
 1. Introduction to Application (for Resubmission applications)
 2. * Program Plan
 3. Plan for Instruction in Responsible Conduct
 4. Plan for Instruction in for Enhancing Reproductive Health
 5. Multiple PD/PI Leaders (if applicable)
 6. Progress Report (for applications)
 7. Participating Faculty
 8. Letters of Support
 9. Data Tables
 10. Vertebrate Animals
 11. Select Agent Research
 12. Consortium/Contract Arrangements
 13. Other Plan(s)
 14. Appendix

Section 1 - Basic Information
 1.1. * Study Title (max 255 characters)
 1.2. * Is this Study Experimental?
 1.3. Exemption Number
 1.4. * Clinical Trial Questionnaire
 1.4.a. Does the study involve human subjects?
 1.4.b. Are the participants human subjects?
 1.4.c. Is the study a clinical trial?
 1.4.d. Is the study a clinical trial?
 1.5. Provide the Clinical Trial Questionnaire

Section 2 - Study Population
 2.1. Conditions or Focus
 2.2. Eligibility Criteria
 2.3. Age Limits
 2.3.a. Inclusion of Individuals
 2.4. Inclusion of Women
 2.5. Recruitment and Enrollment
 2.6. Recruitment Status
 2.7. Study Timeline
 2.8. Enrollment of Individuals
 2.9. Inclusion Enrollment

Use of Human Specimens
 * Does any of the proposed research involve the use of human specimens?
 Provide an explanation if "Yes".
 Please complete the human specimen information. The following items are taken from the Research and Related Information Form (R&R) and must be made on the Research and Related Information Form (R&R).

Other Requested Information
 Study Record(s)
 Attach human subject study records.
 1) Please attach Human Subject Study Record(s).
 Delayed Onset Study(ies)
 Attach human subject study records for delayed onset studies. For delayed onset studies, attach a record for each study. For delayed onset studies, attach a record for each study. For delayed onset studies, attach a record for each study.

Appendix
 13. Appendix

PHS 398 Modular Budget
 OMB Number: 0925-0001
 Expiration Date: TBD
 Budget Period: 1 Form allows for up to 5 Budget Periods.
 Start Date: [] End Date: []
A. Direct Costs
 Direct costs requested must be \$250K or less per period to use Modular Budget form. Request in "modules" of \$25K.
 Some grant programs have limits on Total Direct Costs. Check announcement.
 Direct Cost less Consortium Indirect (F&A) \$ 0.00
 Consortium Indirect (F&A) \$ []
 Total Direct Costs \$ 0.00
B. Indirect (F&A) Costs
 Form allows for up to four F&A entries.
 Indirect (F&A) Type [] Indirect (F&A) Rate (%) [] Indirect (F&A) Base (\$) [] Funds Requested (\$) []
 Cognizant Agency (Agency Name, POC Name and Phone Number) []
 Indirect (F&A) Rate Agreement Date [] Total Indirect (F&A) Costs \$ []
C. Total Direct and Indirect (F&A) Costs (A + B)
 Funds Requested (\$) \$ 0.00
Cumulative Budget Information System calculated.
1. Total Costs, Entire Project Period
 Section A, Total Direct Cost less Consortium Indirect (F&A) for Entire Project Period \$ 0.00
 Section A, Total Consortium Indirect (F&A) for Entire Project Period \$ []
 Section A, Total Direct Costs for Entire Project Period \$ 0.00
 Section B, Total Indirect (F&A) Costs for Entire Project Period \$ []
 Section C, Total Direct and Indirect (F&A) Costs (A+B) for Entire Project Period \$ 0.00
2. Budget Justifications
 Personnel Justification [] Add Attachment Delete Attachment View Attachment
 Consortium Justification [] Add Attachment Delete Attachment View Attachment
 Additional Narrative Justification [] Add Attachment Delete Attachment View Attachment
 FORMS-H: If a Data Management and Sharing (DMS) plan is included, you must provide this attachment and include a section titled "Data Management and Sharing Justification" that provides a brief summary of DMS activities and justification for their costs.

grants.nih.gov/grants/guide/pa-files/pa-20-185.html

Department of Health and Human Services

Part 1. Overview Information

Participating Organization(s)	National Institutes of Health (NIH)
Components of Participating Organizations	<p>NATIONAL INSTITUTES OF HEALTH (NIH)</p> <p>National Eye Institute (NEI)</p> <p>National Heart, Lung, and Blood Institute (NHLBI)</p> <p>National Human Genome Research Institute (NHGRI)</p> <p>National Institute on Aging (NIA)</p> <p>National Institute on Alcohol Abuse and Alcoholism (NIAAA)</p> <p>National Institute of Allergy and Infectious Diseases (NIAID)</p> <p>National Institute of Arthritis and Musculoskeletal and Skin Diseases (NIAMS)</p> <p>National Institute of Biomedical Imaging and Bioengineering (NIBIB)</p> <p>Eunice Kennedy Shriver National Institute of Child Health and Human Development (NICHD)</p> <p>National Institute on Deafness and Other Communication Disorders (NIDCD)</p> <p>National Institute of Dental and Craniofacial Research (NIDCR)</p> <p>National Institute of Diabetes and Digestive and Kidney Diseases (NIDDK)</p> <p>National Institute on Drug Abuse (NIDA)</p> <p>National Institute of Environmental Health Sciences (NIEHS)</p> <p>National Institute of General Medical Sciences (NIGMS)</p> <p>National Institute of Mental Health (NIMH)</p> <p>National Institute of Neurological Disorders and Stroke (NINDS)</p> <p>National Institute of Nursing Research (NINR)</p>

1:46 PM
11/9/2022

PROPOSAL PREPARATION REMINDERS

Proposal Guidelines by Priority

Specific Funding Opportunity (FAO, PA, RFA)

General Sponsor Guidelines

[NIH General Application Guidelines](#)

[NSF Proposal & Award Policies & Procedures Guide \(PAPPG\)](#)

[DOD General Application Instructions](#)

Hints & Tips

Start Early!

Are there any subawards?

Institutional Signed/Approved SubRecipient Paperwork

Are there are foreign components?

Contact Export control?

Institutional Certification

NIH Genomic Data Share Policy

Tracey Fraser, Senior Director OCGA

Institutional Certification

Required for the submission of large-scale human genomic data under the NIH Genomic Data Sharing (GDS) Policy

Assures NIH that the submission of data to a NIH-designated data repository is consistent with:

1. The NIH GDS Policy
2. The informed consent of the original study participants, and / or
3. The preferences of the original study population

Timing

Proposal

Data Management and Sharing plan is submitted

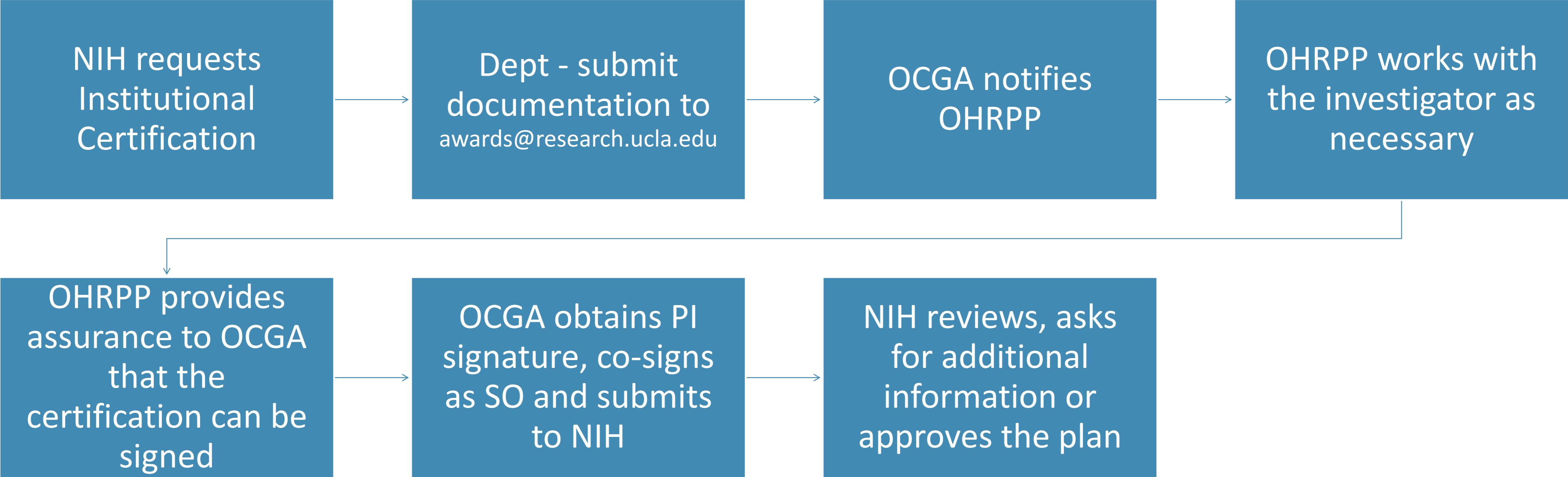
Just-in-Time

NIH requests Institutional Certification

Award Stage

Certification must be submitted and accepted before the award can be issued

Workflow



Any Questions?

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



Extramural Fund Management

November 10, 2022

Agenda

- **The New Final Financial Deliverable Procedure**
 - Changes announced at August 2022 RAF
 - Understanding the current challenges
 - Exploring possible solutions
 - Next steps

What was communicated in August RAF

- More details of the background and the new procedures can be found in the August 2022 RAF presentation on [the ORA-RAF website](#).

Important Upcoming Changes

- **Target Effective Date: January 1, 2023**
 - Closeout packets due on January 1, 2023, and onward.
- **Key changes:** In the final financial deliverables (the final), EFM will consider including the only expenses that are **posted to the project fund in GL** and **included in the closeout packet** (COP). If expenses are not posted to the fund in GL, EFM will not include them in the final even if they are included as adjustments in the COP for the **finals due 60 days or later** after the project period.
 - Monthly reconciliation, required by UCLA [policy 910](#), can ensure that all expenses are posted to the project fund in GL including cost transfers before submitting a COP to EFM (Refer to the reconciliation timeline in the next slide).
 - The PI/Department will be responsible for locating unrestricted funding source to cover expenses not included in the Final and transfer them off from the project fund.
- **Business scenarios:** If there are any business scenarios we should consider in developing the new procedure, email them to Yoon (yoon.lee@research.ucla.edu).
 - Any questions or comments are welcome and appreciated.

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From RAF
in August 2022

What was communicated in August RAF

- More details of the background and the new procedures can be found in the August 2022 RAF presentation on [the ORA-RAF website](#).

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Important Upcoming Changes

- **Target Effective Date: January 1, 2023**

- A revision request submitted to EFM on January 1, 2023 and onward.

- **Key changes:** No change to a downward revision request. For an upward revision request,

- Increasing thresholds for revision as follows;

	Current	January 1, 2023 ~
When a closeout packet is submitted	\$5,000	\$10,000
When a closeout packet is not submitted	\$10,000	\$30,000

- Reducing the number of revision and the window for a revision as follows;

	Current	Due Date	
Number	Up to 2	Within 120 days	after the original final due date or the submission date of the final, whichever is later
Timing	1	Within 60 days	

60 days after the original final due date is aligned with NIH requirement (180 days from the project end date).

- **Soliciting Feedback**

- Any questions or comments are welcome and appreciated. Share your feedback with Yoon, yoan.lee@research.ucla.edu.

From RAF in August 2022

Understanding Current Challenges

- **Campus communicated the followings as key challenges in recording all C&G expenses to the project fund timely before submitting a closeout packet.**
 - *Non-Payroll*: Delays in processing invoices.
 - *Payroll*: Delays in addressing issues reported to the UCPATH Center/CRU related to direct retros and other payroll related corrections.
- **For Non-payroll, ORA reached out to Procurement and AP (“P2P”) to understand the current process and to find solutions for timely posting of C&G expenses to the project fund. A few discussions took place, some of which included research administrators from the departments.**
 - P2P team processes a high volume of invoices and AP’s current service level agreement is 30 days to process an invoice from the AP team’s receipt of the invoice.
 - Not only subaward invoices but also some non-subaward invoices are sent to the departments by vendors and this adds to a delay in posting C&G expenses to the project fund.
 - Vendors submitting electronic invoices through Transcepta can be helpful to reduce the invoice processing time. Processing paper invoices takes about 3 times more.
 - The current system and business processes do not always support routing invoices to the current department fund manager.
 - The current system does not provide the department with visibility of the invoices that require department’s actions.

Understanding Current Challenges

- **For Payroll, there are delays in addressing issues related to Direct Retros or other payroll related corrections in UCPath Center (“UCPC”)/CRU, making it challenging to post all payroll expenses to the project fund timely before submitting a closeout packet.**
 - Often time, UCPC’s actions are required to resolve the issues. CRU submits the ticket to UCPC. UCPC has the process of assigning priority based on scores assigned for each of the 6 following areas. Scoring is done by the local campus as the ticket is submitted to UCPC.
 - This prioritization methodology was supported by the General Ledger Community of Interest Group (formerly known as UC Campus Controller team).
 - If the issue is caused by a bug affecting a specific scenario (instead of a system design defect) and does not affect a high number of employees or significant financial impact, or it’s not required by regulatory requirement, it is likely to get low scoring.

Is it required?	Locations Impacted?	# of Employees Impacted and/or Financial impact?	Impact on Manual Work/ Costs?	Frequency?	High Level IT Effort?
Legal Compliance/ Regulatory = 5 UC Policy = 3 Not Required = 1	Systemwide = 3 Multiple = 2 Single = 1	High = 5 Medium = 3 Low = 1	Great Improvement= 5 Moderate Improvement = 3 No/Limited Improvement = 1	Recurring = 5 Sometimes = 3 One-time = 1	Complex (>161hours) = 0 Large (81–160 hours) = 1 Medium (41–80 hours) = 3 Small (0–40 hours) = 5

Understanding Current Challenges

- **The new procedure is primarily being developed to ensure that UCLA is compliant with Uniform Guidance (UG), specifically §200.344 Closeout, although some of other non-federal sponsor have the same requirements.**
- **Focus on addressing key challenges around Federal funds first.**
 - The final financial report is due to the sponsor 120 days after the project end.
 - The closeout packet is due to EFM 90 days after the project end.
 - How can we post all expenses by 90 days from the project end date before submitting a closeout packet?

Understanding Current Challenges (Federal)

“§200.344 Closeout: The final financial report and the final cash draw **must** be submitted within **120 days** from the project period end.”

After the project end	1 ~ 30 DAYS	31 ~ 60 DAYS	61 ~ 90 DAYS	91 ~ 120 DAYS
	Department			EFM
✓ Payroll (excl. pending UCPATH/CRU actions)	Review the final month payroll expenses and process Salary Cost Transfers, Benefit Cost Transfers, and/or other payroll related corrections as needed.	Confirm accuracy of corrections. Process additional adjustments as needed.	Prepare a closeout packet (COP). All payroll in the COP should have been posted to the project fund (No pending salary cost transfer adjustments).	Fund management team: Reviews the COP to finalize expenses. Prepares and submit the final financial report or the final invoice. Cash management team: Review authorized amount in the sponsor’s system and draw cash on letter of credit based on the final expenses.
✓ Nonpayroll (excl. Subawards)	Review the final month nonpayroll expenses and process expense transfers as needed. Review open POs and follow up with vendors to get invoices for the goods and services purchased and/or delivered for the last month or prior months.		All nonpayroll in the COP should have been posted to the project fund except for subawards.	
✓ Payroll corrections pending UCPATH/CRU	If an issue is discovered from the last month payroll or prior months, submit the ticket to report the issue to the CRU. If the issue is not resolved in time, include the payroll adjustment in the COP with adequate supporting documentation and the service ticket number/date.			EFM will include such payroll in the final when appropriate.
✗ Nonpayroll (subawards)	Follow up with the subawardees for the final invoice and past due invoices if any. For FDP, interim invoices are due to UCLA 30 days after the month end (monthly/quarterly). The final invoice is due to UCLA 60 days after the project end.		Department to get PI’s approval and send it to AP. AP to process the invoice (currently 30 days).	Including expenses not posted in GL in the final is not compliant with Uniform Guidance.

Solutions are needed

Exploring Solutions: Subaward Expenses

- **The current purchasing and payable system offers limited functionality, restricting solution options. Jagger implementation will address some challenges but it goes live later next year. In the meantime, ORA and AP are exploring temporary solutions for timely posting of C&G expenses to recover all project costs incurred. The following options are being considered;**
 - AP already has the process of prioritizing subaward invoices. ORA and AP are discussing if AP can further prioritize the final subaward invoice for processing (possibly department indicate “federal final subaward invoice” in the comment section in the subaward invoicing portal).
 - AP has hired additional staff to address email and phone inquires. This will benefit to address urgent items to process.
 - It is an option to consider shortening the subaward project period by one month earlier than the project period with the prime sponsor.
 - It is an option to split the last 60 days among Department, AP, and EFM evenly; 20 days for the department to obtain the PI’s approval and route it to the AP, 20 days for AP to process the final subaward invoices (instead of the current 30 days), and 20 days for EFM to review a closeout packet and prepare the final.
- **Solutions will not be likely available in time to implement the new procedure effective January 1, 2023.**

New Procedure of Preparing the Final: Now What?

- **Urgency and importance of implementing the new procedure remains high but postponing the target effective date of the new procedure to address challenges mainly around subaward expenses.**
 - EFM will collect the data (all expenses not posted in GL but included in the final) to identify areas where expenses will be at risk for reimbursement under the new procedure and quantify financial risk, using PAMS adjustment pages at each month end.
 - EFM has started collecting the data from October 2022 and will continue through March 2023.
 - After March 2023, EFM will evaluate the financial and compliance risks based on the data and the status of solutions to facilitate timely posting of non-payroll expenses to the project fund.
 - In the meantime, as EFM gathers the data, EFM will work with AP team to develop solutions for timely posting of contract and grant expenses. EFM will also reach out to the departments with material adjustments to better understand challenges with real examples and collaborate to find solutions.
- **Thank you, those who reached out to me to share your thoughts on the procedure and suggestions!**
 - Your feedback and ideas are welcome and appreciated. Please continue to reach out to me if you have any thoughts to share.

Key Takeaways

- **Changes to the procedure of preparing the final financial deliverable:**

	Communicated in August RAF	Changes
Target effective date	January 1, 2023	To be determined after evaluating the data and solution status, after March 2023
Applicability	<ul style="list-style-type: none"> • All contract and grant funds <i>and</i> • The final is due 60 days or later after the project period 	<ul style="list-style-type: none"> • Federal funds only <i>and</i> • If the award has multiple fund numbers for the project period, the fund for the last year of the project only (not applicable to funds for interim budget years)

- **Changes to the revision process:**

- At August 2022 RAF: Target effective date was communicated as January 1, 2023 → Will go into effect as the new final procedure goes into effect.
- **The new procedure is necessary to protect the PI’s research projects and the University from financial consequence of non-compliance and to continue to receive future funding for the research community without adversely impacting University’s reputation. The new procedure will need to be implemented sooner than later.**
- **Continue to perform monthly reconciliation for timely correction of errors if any.**
- **Share your challenging cases and ideas for possible solutions with Yoon Lee, yoony.lee@research.ucla.edu**

Any Questions?

Contact Information

EFM Website

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

Yoon Lee

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November 2022 Research Administration Forum Q&A

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Research Data Working Group

Q1: How does this differ from the existing data sharing plans that PI's submit with NIH proposals?

A1: The major difference is that it is required for all research proposals. We recommend careful review of the policy, instructions, templates, and FAQs provided by NIH.

Q2: Is there a quick way for a given PI to answer the question "Do I need a DMS?" Is it as simple as that it will be required any time it's an R grant with any scientific data? Will Cayuse create an error with no plan?

A2: The starting point should be to assume that a plan will be required unless it's a training or infrastructure grant. Systematic errors are controlled by the Sponsor and specific to the PA.

Q3: For budgeting, is there a place to find the cost for software at UCLA (campus or medical center?)

A3: Support for budgeting requirements is being discussed by the Research Data Working Group.

Q4: Does this new policy apply to NIH progress reports for currently funded projects?

A4: From the NIH website the new DMS policy applies as follows:

The effective date for the DMS Policy is January 25, 2023. Specifically, the policy applies to:

- Competing grant applications that are submitted to NIH for January 25, 2023 and subsequent receipt dates.
- Proposals for contracts that are submitted to NIH on or after January 25, 2023.
- NIH Intramural Research Projects conducted on or after January 25, 2023.
- Other funding agreements (e.g., Other Transactions) that are executed on or after January 25, 2023, unless otherwise stipulated by NIH.

Q5: Can campus come up with a verbiage, the same as of TIF, for budgeting purpose?

A5: Some standard language will likely be developed over time, but different language will be required for different approaches to data sharing.

Q6: How is UCLA monitoring compliance?

A6: ORA and Audit office will discuss a feasible monitoring process.

Q7: I think the policy requires a description of how each institution will comply. Will there be boilerplate made eventually?

A7: A boilerplate may not be appropriate because it will likely depend on the nature of the research and the type of data being uploaded.

Q8: When these are budgeted, will NIH expect to see a one-time set of charges for the total cost of complying with the plan, or does NIH expect to see data sharing charges for each year during which the PI expects they will have data to share?

A8: It depends on the project design and the data sharing plan. The costs could be a one-time set-up fee early in the project period, or could be expended in the last project year. Costs must be incurred before the end of the project period to be allowable.

Extramural Fund Management Hot Topics

Q1: If we are the sub, our closeout process is 60 days only, can you please confirm and explain the process?

A1: The new procedure of preparing the final invoice or the final financial report will be applicable only to direct Federal funds. For the federal pass through, the current standard procedure of preparing the final will continue to apply. More details about the current [closeout procedure](#) and [closeout packet deadlines](#) can be found on the EFM website.