



Research Administration
Contract & Grant Administration

OCGA's Outgoing Subawards Team (OST): Upcoming Form and Website Changes

Research Administration Forum

September 14, 2023

OST: *Upcoming Changes*

Upcoming Outgoing Subawards Team (OST) changes, to take effect **October 2nd**:

- **Forms**
 - *Consolidation of OST forms required at proposal stage*
 - *Streamlining of form questions*
 - *Subrecipient information now required at award stage (to help streamline and minimize collection volume)*
- **EPASS 'Subawards' Tab**
 - *Submission of subaward proposal documents via a new EPASS Subawards tab*
- **Website**
 - *Overall reorganization and redesign to be more customer-focused*
- **NIH Policy**
 - *New NIH reporting requirements for international subrecipients*

OST: Form Changes

Proposal Stage Forms *(Current)*

UCLA OCGA
FDP EXPANDED CLEARINGHOUSE PILOT SUBRECIPIENT LETTER OF INTENT
This can ONLY be used in lieu of the UCLA OCGA Subrecipient Commitment Form by institutions who are listed as part of the FDP Expanded Clearinghouse Pilot at <https://ocga.ucla.edu/clearinghouse>

Subrecipient (Date) _____ Pass Through Entity (PTE) The Regents of the University of California, Los Angeles
Legal Name _____ PTE Name _____
Sub ID: _____ PTE ID: RNS4EPNHC6

Sub Principal Investigator: _____ PTE Principal Investigator: _____
Sub Internal Project Identifier (or A#): _____ PTE Internal Project Identifier (or A#): _____

Project Title: _____
Prime Awarding Agency: _____ Complete Project Period: Start: _____ End: _____
Total Proposed Amount for Complete Project Period: \$ _____ Cost Sharing Amount for Complete Project Period: \$ _____

Federally negotiated FBA rate that matches our FDP Expanded Clearinghouse Pilot Entity Profile
 A reduced FBA rate dictated by the prime awarding agency. Rate: _____ Base Type: _____
 Not applicable (no indirect costs are requested by Sub)

Project Use Information:
Human Subjects Yes No Animal Subjects Yes No Stem Cells Yes No Genomic Data Sharing Yes No

Substitutional Authorized Official Information:
Sub Name/Title: _____ PTE Name/Title: _____
Sub Phone: _____ PTE Phone: _____
Sub Email: _____ PTE Email: _____
Sub Email For Awards (if different from above): _____
Sub Place of Performance (the same as FDP Expanded Clearinghouse Pilot Entity Profile's): Yes No (No FBA reporting required)

This proposal has been reviewed and approved by the appropriate official(s) of Subrecipient, and certified to its accuracy and completeness. The appropriate programmatic and administrative personnel of Subrecipient involved in this application are aware of the prime awarding agency's policies, agree to accept the obligation to comply with award terms, conditions and certifications, and are prepared to establish the necessary inter-institutional agreement consistent with that policy.

The following documents are attached to this Statement of intent:
 Sub Statement of Work (required) Sub Budget justification (required)
 Sub Detailed Line Item Budget (required) Other: _____

Signature of Subrecipient's Authorized Official _____ Date _____
Name and Title of Authorized Official _____

FDP Expanded Clearinghouse Pilot (October 6/9/2022)

FDP LOI

UNIVERSITY OF CALIFORNIA
MULTI-CAMPUS (MCA) COMMITMENT FORM
All UC campuses participating in multi-UC prime campus awards should submit this form when submitting a proposal to UC Prime Campus/Division. It provides a checklist of required documents and certifications.

Prime Campus/Division: _____ Prime Sponsor: _____
Project Title: _____
Participating Campus: Agriculture & Natural Resources
Participating Campus Department: _____
Participating Campus Total Funds Requested: _____
Participating Campus Performance Period Begin Date: _____ End Date: _____

SECTION A - Proposal Documents (check all that apply)
The following documents are included in our subaward proposal submission and covered by the certifications below:
 STATEMENT OF WORK (required)
 BUDGET AND BUDGET JUSTIFICATION (required)
 SUBRECIPIENT COMMITMENT FORM (this form)
 OTHER (specify): _____

SECTION B - Certifications (check all that apply)
1. **Federally negotiated rate and base applied to this proposal is** Federally negotiated FBA Rate Agreement MTCO (FBA Rate Agreement) based on the following:
 Federally negotiated FBA rates for this type of work.
 Other (specify): _____

2. **Human Subjects** Yes No
3. **Animal Subjects** Yes No
4. **Stem Cells** Yes No
5. **Recombinant DNA** Yes No
6. **Cost Sharing** Yes No
Cost sharing amounts and justification must be included in the Participating Campus budget. Please be advised that an annual verification of cost share commitment will be required.

06/09/2022

MCA Commitment

University of California, Los Angeles **Attachment B**
Office of Contract and Grant Administration
SUBRECIPIENT COMMITMENT FORM
All Subrecipients must complete this form when submitting a proposal to UCLA. It provides a checklist of documents and certifications required by sponsors and it must be endorsed by the authorized institutional representative prior to proposal submission.

Subrecipient's Legal Name: _____
Subrecipient's Principal Investigator: _____
UCLA's Principal Investigator: _____ Prime Sponsor: _____
UCLA's Proposal Title: _____
Subrecipient Total Funds Requested: _____ Performance Period Begin Date: _____ End Date: _____

SECTION A - Proposed Documents - ALSO SEE SECTION E to avoid the questions and completed a Subrecipient continues to fill out the rest of the form.
The following documents are included in our subaward proposal submission and covered by the certifications below:
 STATEMENT OF WORK (required)
 BUDGET AND BUDGET JUSTIFICATION (required)
 SUBRECIPIENT COMMITMENT FORM (this form)
 OTHER (specify): _____

SECTION B - Certifications
1. **Federally negotiated rate and base applied to this proposal has been calculated based on the following:**
 Our federally negotiated FBA rates for this type of work. If this box is checked, a copy of your FBA rate agreement must be furnished to UCLA Office of Contract & Grant Administration (OCGA).
 A reduced FBA rate dictated by the prime sponsor that we hereby agree to accept. Rate: _____ Base Type: _____
 Not applicable (no indirect costs are requested by Subrecipient).

2. **Fringe Benefit Rates** included in this proposal have been calculated based on the following:
 Rates are consistent with our Federally negotiated rates. If this box is checked, a copy of your Federal fringe benefit rate agreement must be furnished to UCLA OCGA.
 Other rates as specified in Section F. Comments (please specify the basis on which the rate has been calculated): _____

3. **Human Subjects** YES NO
4. **Animal Subjects** YES NO
5. **Stem Cells** YES NO
6. **Recombinant DNA** YES NO
7. **Cost Sharing** YES NO
8. **Other** YES NO
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OST: Form Changes

Proposal Stage Forms – Upcoming Changes Effective October 2nd

FDP LOI

MCA Commitment

Subrecipient Commitment & related docs

Determination Checklist

Fair & Reasonable

'Universal' Letter of Intent (Proposal Stage)

Institutional Information Form (Award Stage)

Fair & Reasonable (For-Profit Entities only)

OST: Form Updates

Proposal Stage Forms – Effective October 2nd

'Universal' Letter of Intent

Institutional Information Form

Fair & Reasonable

- **'Universal' Letter of Intent**
 - REQUIRED at proposal stage
 - Project information only
 - 'Smart' form for FDP expanded clearinghouse members and sister-UC campuses
 - Alternatively, the OST can accept the Multi-Campus Commitment form, if a sister-UC campus prefers to use it
- **Institutional Information Form**
 - Can be collected at proposal stage, but is not required until award stage
 - FAMQ consolidated into this form, removed when Audit question answered 'yes'
- **Fair & Reasonable Cost Analysis**
 - Determination consolidated into this form (not required in any other situation)

OST: Proposal Stage Forms

Required Proposal Documents for all Subrecipient entities:

- 'Universal' Letter of Intent (*Site*)
- For-profit entities only: Fair and Reasonable Cost Analysis Form (*UCLA*)

Plus

- Site's Detailed SoW (*Site*)
- Site's Detailed Line Item Budget-Justification (including Cost share Budget/Just. *if app.*) (*Site*)

Required Award Documents for Subrecipients who ARE NOT FDP Expanded Clearinghouse Members or Sister-UC campuses:

- Subrecipient Institutional Information form (*Site*)

OST: 'Universal' Letter of Intent

'Universal' Letter of Intent

UCLA OCGA requires this form to be completed and submitted with each subaward proposal. This form provides project-specific information and represents the Subrecipient's intent to collaborate with UCLA. This form may also be used for proposed outgoing Multi-Campus Awards (MCAs). It must be endorsed by an Authorized Official prior to proposal submission. **FDP Expanded Clearinghouse Members and Sister-UC Campuses:** indicate your membership in the below 'Subrecipient Information' section to remove entity-specific questions from this form. Should this project be awarded, an Institutional Information form will be required for any non-UC entities that do not belong to the FDP Expanded Clearinghouse.

UCLA OCGA requires all Subrecipients have a Unique Entity Identifier (UEI) number before any subaward is issued.


UCLA OCGA requires this form to be completed and submitted with each subaward proposal. This form provides project-specific information and represents the Subrecipient's intent to collaborate with UCLA. This form may also be used for proposed outgoing Multi-Campus Awards (MCAs). It must be endorsed by an Authorized Official prior to proposal submission. **FDP Expanded Clearinghouse Members and Sister-UC Campuses:** indicate your membership in the below 'Subrecipient Information' section to remove entity-specific questions from this form. Should this project be awarded, an Institutional Information form will be required for any non-UC entities that do not belong to the FDP Expanded Clearinghouse.

UCLA Project Information			
Principal Investigator		Prime Sponsor	
Proposal Title			
Subrecipient Information			
Legal Name		UEI Number*	
Principal Investigator		Total Requested Costs	USD
Project Start Date		Project End Date	
Indirect Cost Rate(s)	<input type="checkbox"/> U.S. Federally negotiated rate <input type="checkbox"/> Prime Sponsor dictated rate <input type="checkbox"/> U.S. De Minimis rate <input type="checkbox"/> No IDC (no indirect costs requested) <input type="checkbox"/> Other (specify basis): _____		Total Cost Share USD
		<input type="checkbox"/> FDP Expanded Clearinghouse Member? YES <input type="checkbox"/> <input type="checkbox"/> Sister-UC Campus? YES <input type="checkbox"/>	
*UCLA OCGA requires all Subrecipients have a Unique Entity Identifier (UEI) number before any subaward is issued.			

- Selecting FDP Expanded Clearinghouse Member or Sister-UC Campus will remove the indirect cost rate agreement and FCOI policy questions from the forms – the OST already has access to that information for FDP Expanded Clearinghouse Members and Sister-UC Campuses.
- Selecting Sister-UC Campus will also add a campus drop down and auto-fill the unique entity identification (UEI) number and award e-mail address for the selected campus.

OST: Institutional Information Form

Subrecipient Institutional Information Form



University of California, Los Angeles (UCLA)
Office of Contract & Grant Administration (OCGA)
Subrecipient Institutional Information Form (SIIF)

UCLA OCGA requires this Subrecipient Institutional Information Form (SIIF) to be completed by non-FDP Expanded Clearinghouse Subrecipients who have not collaborated with UCLA within the last year. This form provides UCLA with the entity specific information needed to complete its subrecipient review process and must be submitted by the subrecipient to UCLA prior to the issuance of a subaward agreement.

Subrecipient General Information			
Legal Name			
Address		City	
State	Zip+4	Country	
UEI Number	EIN	Registered in SAM.gov? <input type="checkbox"/> No <input type="checkbox"/> Yes	
Central Office E-mail		Central Office Phone	
Entity Type		Entity Established Date	
Subrecipient Owned/Controlled by Parent Entity? <input type="checkbox"/> No <input type="checkbox"/> Yes -- Parent entity information provided below:			
Legal Name			
Address		City	
State	Zip+4	Country	
Parent UEI Number	Parent EIN		

Facilities & Administrative (F&A) Rates (check one):

Does the subrecipient have a U.S. federally-negotiated indirect cost (F&A) rate agreement?

Yes, and a complete copy is either attached or can be found at the following link:

No, organization does not have a U.S. federally-negotiated indirect cost (F&A) rate agreement

Audit/Financial Statements

Was the subrecipient required to conduct an annual audit in accordance with the U.S. Uniform Guidance (UG) Subpart F, Audit Requirements for the most recent Audit year?

YES, and a complete copy of the subrecipient's most recent UG audit report can be found at the following public internet URL link:

NO, the subrecipient does not have an audit in accordance with the U.S. Uniform Guidance (UG) and must provide a complete UCLA [Financial Audit Management Questionnaire](#).

(If questionnaire is not automatically added to this form upon selection of "No", a copy of the questionnaire can be found at: <https://ocga.research.ucla.edu/wp-content/uploads/financial-audit-management-questionnaire.pdf>)

Agency Specific Compliance Policies

National Science Foundation (NSF), National Institutes of Health (NIH) and National Institute of Food and Agriculture (NIFA) Responsible Conduct of Research Applicable to projects funded by NSF, NIH, NIFA or any other programs requiring Responsible Conduct of Research Training.

Should subrecipient organization/institution receive funding from NSF, NIH, NIFA, or any other agencies requiring Responsible Conduct of Research training, subrecipient certifies that it has implemented a Responsible Conduct of Research training program compliant with the related prime sponsor's training policy and will ensure that all personnel required to complete Responsible Conduct of Research training in accordance with agency requirements.

Subrecipient does not have a Responsible Conduct of Research training program.

U.S. Public Health Service (PHS)/National Institutes of Health (NIH) Research Misconduct Applicable to projects funded by U.S. PHS/NIH.

Subrecipient organization/institution hereby certifies that it has filed a PHS form 6349 annually with the Office of Scientific Integrity

Subrecipient organization/institution hereby certifies that it has completed and submitted the "Assurance of Compliance by Subaward Recipients available at: <http://ori.hhs.gov/sites/default/files/PHS-6315.pdf>

Subrecipient does not have a program for dealing with or reporting research misconduct allegations to the U.S. PHS/NIH.

Human Subject Use

Does subrecipient organization/institution have an [HHS/OHRP Human Subjects FWA Approval](#)? YES NO

If yes, FWA Approval number is:

Is the subrecipient organization/institution AAHRPP accredited? YES NO

Animal Subject Use

Does subrecipient organization/institution have a [PHS/OLAW assurance](#)? YES NO

If yes, PHS/OLAW assurance number is:

Federal Funding and Accountability Transparency Act (FFATA)

Federal Funding Accountability and Transparency Act (FFATA) Applicable to projects funded by the U.S. federal government.

YES NO During the previous fiscal year subrecipient organization/institution received 80% or more of its annual gross revenues in U.S. federal awards; AND

YES NO \$25 million or more in annual gross revenues from federal awards; AND

YES NO The public does NOT have access to information about the compensation of the senior executives of the entity through periodic reports filed under section 13(a) or 15(d) of the Securities and Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d) or section 6104 of the Internal Revenue Service Code of 1986 [26 USC 6104]

If 'YES' to all three questions above, provide the names and total compensations of the five (5) most highly compensated officers of the subrecipient entity:

Name of officer:	Officer compensation:

Comments (please attach additional pages if necessary)

DEBARMENT AND SUSPENSION

By signing, Subrecipient certifies that:

- Subrecipient, the PI or any other employee or student participating in this project are not debarred, suspended, proposed for debarment, declared ineligible, or otherwise excluded from or ineligible for participation in federal assistance programs, federal contracts, or activities.
- Subrecipient, the PI or any other employee or student participating in this project are not presently indicted for, or otherwise criminally or civilly charged by a government entity.
- Subrecipient has not within three (3) years preceding this offer, been convicted of or had a civil judgment rendered against them for commission of fraud or criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state or local) contract or subcontract; violation of Federal or State antitrust statutes relating to the submission of offers; or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property.
- Subrecipient has not within three (3) years preceding this offer, had any contract terminated for default by any federal agency.

*** If subrecipient cannot certify to any of the above, explain in the Comments section above.**

In signing below, the subrecipient organization/institution certifies that, should UCLA award pass-through U.S. federal funding to subrecipient, subrecipient organization/institution is in compliance with the Drug Free Workplace Act of 1988; they are in compliance with U.S. Code, Section 1352, restrictions on the use of federal funds for the purpose of lobbying; and they have filed with DHHS compliance offices certification forms governing Civil Rights (441), Handicapped Individuals (641), Sex Discrimination (639-A), and Age Discrimination (680).

All terms and conditions between the parties will be outlined in a separate formal subaward agreement. The information, certifications, and representations above have been read, signed, and made by an authorized institutional representative of the subrecipient named herein. Any work begun and/or expenses incurred prior to execution of a subaward agreement are at the Subrecipient's own risk.

SUBRECIPIENT AUTHORIZED INSTITUTIONAL OFFICIAL:

Name and Title

Signature/Date

OST: Website Changes

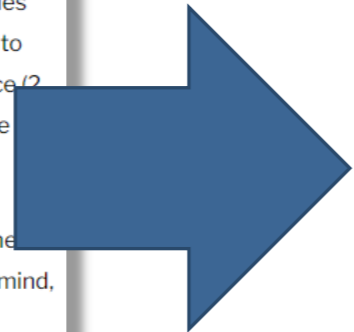
Outgoing Subawards Overview

An Outgoing Subaward is a formal written agreement between UCLA and another party to perform a portion of the statement of work under a UCLA assistance award (i.e. UCLA grant or cooperative agreement). The terms of the relationship are influenced by the prime agreement received by UCLA, and the third parties' statement of work. OCGA prepares and negotiates all outgoing subawards for prime awards accepted by OCGA. All outgoing subawards must be monitored to ensure that the subrecipient complies with these terms. Federal regulations for subrecipient determination and monitoring are found in the Uniform Guidance (2 CFR Chapter I, Chapter II, Part 200, et al. OMB Uniform Administrative Requirements for Federal Awards). A subrecipient works collaboratively with the prime award recipient to carry out the scope of work.

The increase in outgoing subawards in recent years, reflecting the increase of collaboration in research, has resulted in heightened compliance scrutiny by the federal government and other sponsors. Office of Contract and Grant Administration (OCGA) is committed to issuing all subawards with such compliance in mind, and to working with researchers and departments to assist in the effective management of outgoing subawards.







It is important for the UCLA PIs and department administrators to understand their roles and responsibilities in managing outgoing subawards, and to work with OCGA to minimize the risk and ensure successful collaboration and compliance.

For additional information regarding outgoing subawards, please visit our [FAQ page](#) or contact the Subaward Team at ocgasubawards@research.ucla.edu.



Outgoing Subawards Overview

How Do I?

<p>Know if the Project is a Subaward</p>  <p>Amend a Subaward</p> 	<p>Propose/Add a Subaward or MCA</p>  <p>Monitor a Subaward</p> 	<p>Request a Subaward or MCA</p>  <p>Closeout a Subaward</p> 
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Outgoing Subaward FAQs

Current Queue

257

Average Processing Time*

38 business days

OST Website changes:

- More customer focused
- Ease departmental access to OST information, processes and form requirements

OST: *EPASS* tab

EPASS – Subawards *(Currently)*

Currently all information is gathered in one free text field and one document upload table

Outgoing Agreements? If yes, attach Subrecipient/MCA Commitment Form(s) or FDP Expanded Clearinghouse Subrecipient Letter(s) of Intent with applicable attachments, and Subrecipient vs. Contractor Determination Checklist for each subaward. See [Outgoing Subawards Form](#) for details and forms.

Yes No

List the name of each subaward entity

Maximum 500 characters.

For each Subaward entity, attach a single, combined, PDF with the applicable documents for that entity.

Upload Outgoing Subaward Documents

File Type: .pdf.

The individual file sizes cannot exceed 25MB.

Click the button below to attach a new file.

[+ Attach file](#)

OST: *EPASS tab*

EPASS Subawards Tab – *Effective October 2nd*

Outgoing Agreements? If yes, complete an entry for each combination of subrecipient and subrecipient PI on the subsequent page.

Yes No

OST: EPASS tab

EPASS Subawards Tab – *Effective October 2nd*

REMINDER: For S2S Grants (Cayuse) proposals, please contact eRAHelp@research.ucla.edu if any information in a subrecipient's Institutional Profile needs to be updated.

+ Add Subaward

Subrecipient Legal Name

(Click here to select a subrecipient from the list)

Subrecipient PI Name

Subrecipient UEI

Subrecipient PI Email Address

Is subrecipient a for-profit entity?

Yes No

Subrecipient Central Administration Contact (email listed on Letter of Intent or Commitment Form)

+ Attach Fair and Reasonable Cost Analysis

+ Attach IDC Rate Agreement

+ Attach Letter of Intent (LOI)

+ Attach Scope of Work

+ Attach Budget

Attachments

Type	File	Mark for deletion
Fair and Reasonable Cost Analysis		<input type="checkbox"/>

Does the proposed subaward involve any of the following?

Human Subjects (IRB)?

Yes No

Embryonic Stem Cell Research Oversight (ESCRO)?

Yes No

Genomic Data Sharing?

Yes No

Animal Subjects (ARC/IACUC)?

Yes No

Dual Use Research of Concern (DURC)?

Yes No

Subrecipient

Select a subrecipient...

university of

American University of Central Asia (Kyrgyzstan)

Ben-Gurion University of the Negev

Board of Trustees of the University of Illinois, The

Subrecipient PI

Select a subrecipient PI...

Select a subrecipient PI...

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OST: New NIH Reporting Requirements

NOT-OD-23-133 released May 19, 2023 – Notification of new NIH reporting requirements for international subrecipients

- Effective October 1st
- NIH GPS Section 15.2.1 will be updated to include the following (*highlights added*):
 - *For foreign subrecipients, a provision requiring the foreign subrecipient to provide copies of **all lab notebooks, all data, and all documentation that supports the research outcomes** as described in the progress report. These supporting materials must be provided to prime recipient with each scientific update (no less than once every three months) in line with the timelines outlined in the agreement.*
- NIH is encouraging PTE's to address this compliance requirement with our international subrecipients at proposal stage; it also recommends language in Subrecipient letters of support indicating their awareness of these requirements and the subrecipient's willingness to abide
- If a subrecipient cannot comply with this new reporting requirement, we will not be able to proceed with the subaward
- “...all lab notebooks, all data and all documentation that supports the research outcomes...”
 - Updated guidance notes documentation should be received at least every **6 months**
 - Further information is expected from NIH, updates will be provided as they are received
- NIH oversight: NIH is reserving the right to request copies of UCLA's subaward agreement and relevant supporting documentation to confirm UCLA's compliance with this reporting requirement

OST: *New NIH Reporting Requirements*

- **‘Universal’ Letter of Intent has been updated to include a reference/confirmation to this new NIH reporting requirement**

NIH International Subrecipient Reporting Requirements *(For non-U.S. Subrecipients only.)*

- If the prime sponsor is the U.S. National Institutes of Health (NIH), Subrecipient is aware of the provisions of NIH GPS 15.2.1 requiring that international subrecipients provide copies of all lab notebooks, data, and documentation that support any resulting research outcomes and Subrecipient confirms that it is able to comply with the regular submission of these materials to UCLA (i.e. every 6 months) for the life of the subaward.

Questions?

- For questions regarding specific outgoing subawards, contact the OCGA Outgoing Subaward Team member named in your subaward agreement or send an email to ocgasubawards@research.ucla.edu (for Multi-campus Awards: outgoingMCA@research.ucla.edu). Your question will be forwarded to the Subaward Team member assigned to that Subaward or MCA.
- The e-mail addresses ocgasubawards@research.ucla.edu and outgoingMCA@research.ucla.edu are only for communications regarding outgoing subawards (awards in which funding will flow outgoing from UCLA to the subrecipient)
- ***General questions?***

Thank you!